

# **WORKFORCE INVESTMENT ACT**

## **NONDISCRIMINATION AND EQUAL OPPORTUNITY SELF-EVALUATION GUIDE**

Prepared By  
COMPLIANCE MONITORING SECTION  
COMPLIANCE REVIEW DIVISION  
EMPLOYMENT DEVELOPMENT DEPARTMENT

# **NONDISCRIMINATION AND EQUAL OPPORTUNITY SELF-EVALUATION GUIDE**

## **BACKGROUND AND INSTRUCTIONS**

### **Authority**

Section 188 of the Workforce Investment Act (WIA) and Title 29 of the Code of Federal Regulations (CFR) Part 37 set forth the authority of the Civil Rights Center (CRC), U.S. Department of Labor to monitor all recipients of financial assistance under the WIA to determine whether they are complying with its provisions and in compliance with Section 504 and Section 508 of the Rehabilitation Act of 1973, as amended, and the Americans with Disabilities Act (ADA) of 1990. In accordance with Title 20 CFR, Section 667.410 (b), the Employment Development Department (EDD), Program Review Branch, Compliance Review Division (CRD) is responsible for monitoring recipients of WIA funds for compliance with WIA provisions and related regulations.

### **Purpose**

As part of the overall program for monitoring Local Workforce Investment Areas' (LWIA) compliance with Section 188 of the WIA and Title 29 CFR Part 37, the CRD requires that the LWIAs complete and submit to the CRD the Nondiscrimination and Equal Opportunity (NEO) Self-Evaluation Guide (SEG) and its Physical and Program Access addendum. The CRD staff will review the submitted self-evaluations and use the results as one of the tools in determining and assessing the level of compliance with the related regulations. Through self-evaluations, LWIAs can identify both the compliance status of their programs and the areas in which they need technical assistance to implement appropriate corrective action.

### **Background**

The CRD developed the NEO SEG to meet the State of California's oversight responsibility to ensure subgrantee compliance with the WIA and other applicable requirements cited above. In order to ensure that discriminatory practices against people with disabilities are identified and corrected, the Physical and Program Access (PPA) Self-Assessment Checklist was developed to help LWIAs and One-Stop Centers identify areas in need of corrective action.

CRD has incorporated the California PPA Self-Assessment Process as an addendum to the NEO SEG. This document was developed collaboratively by members of the Universal Access Workgroup (UAWG), a sub-committee of the California Workforce Investment Board. The UAWG includes representatives from State partner entities such as the Employment Development Department, the Department of Rehabilitation,

the Department of Social Services, the California Community Colleges, and the California Workforce Investment Board.

The NEO SEG identifies nine major NEO elements, each of which, when fully implemented, will help ensure that the subgrantee is satisfactorily complying with applicable nondiscrimination provisions. The nine NEO elements are:

1. Designation of local level Equal Opportunity (EO) Officer
2. Notice and Communication of EO Policies and Procedures
3. Equal Opportunity Provisions and Nondiscrimination Assurances in all Contracts, Plans, and Agreements
4. Universal Access to WIA Title-I Financially Assisted Programs and Activities
5. Discriminatory Practices Prohibited Against Individuals with Disabilities
6. Collection and Maintenance of EO Data
7. Monitor Service Providers for Compliance
8. Complaint Processing Procedures
9. Corrective Actions/Sanctions

The PPA Self-Assessment Checklist is divided into nine broad access elements that cover the basics of both physical and program access requirements. The checklist supplements Element 5 of the NEO SEG. The access elements are:

1. Integrated Programs
2. Accessible Approach & Entrance
3. Access to Programs and Services
4. Usability of Toilet Rooms
5. Additional Access
6. Communications
7. Emergency Evacuation
8. Staff Development
9. Access to Public Meetings

## **NEO Self-Evaluation Guide Instructions**

The LWIA is asked to complete three sections for each of the nine elements, utilizing the following instructions.

### **Section A. (Responses)**

Answer each question by indicating yes, no, or partially. A "partially" response indicates that some, but not all, portions of the item are complete. Legal citations identified in the References column may be read for additional background and information. Although supporting documentation need not accompany the self-evaluation when it is submitted to the CRD, such documentation must be kept on file at the LWIA. This documentation may be requested in lieu of, or during, on-site reviews conducted by the CRD.

### **Section B. (Deficiencies)**

Summarize any deficiencies found when completing the self-evaluation. A "no" or "partially" response should be addressed here by briefly stating the areas found to be deficient. Only the deficient areas should be described. If there are no deficiencies in Section A, this page does not need to be returned.

### **Section C. (Corrective Action)**

Describe the corrective action taken, or planned to be taken, to rectify each deficiency cited in Section B. Along with the corrective action, state the estimated time frame for accomplishing the corrective action. Again, if there are no deficiencies in Section A, this page does not need to be returned.

## **PPA Self-Assessment Checklist Instructions**

The LWIA is asked to complete the questions and possible solutions for each of the nine elements and sub-elements, utilizing the following instructions.

The first column lists all of the elements and sub-elements. The sub-elements are listed as questions, which require simple "yes" or "no" answers.

The second column provides possible solutions if the answer in column one is "no."

Please answer all questions contained in the Checklist. As applicable, the "possible solutions" should be checked, and additional information provided as appropriate.

## **Submission Instructions**

There may be some components of both the NEO SEG and the PPA Self-Assessment Checklist, which are addressed by questions that may appear to be similar, but are, in fact, directed at different entities (i.e., the LWIA and the One-Stop Centers). Both the guide and the checklists must be completed in their entirety.

The LWIA is responsible for completing and submitting the following items:

- ☐ NEO Self-Evaluation Guide  
(for LWIA operations)
- ☐ PPA Self-Assessment: Addendum – Part 1  
(for LWIA operations) -
  - ☐ Section C – Combined Physical/Program Access Checklist
  - ☐ Section D – Transition Plan
- ☐ One-Stop PPA Self-Assessment Summary: Addendum – Part 2  
(for One-Stop operations).

*Note: Only those items found to be out of compliance are to be entered on the PPA One-Stop Summary.*

Packages should be submitted by **May 15, 2004** to:

Employment Development Department  
Compliance Review Division, MIC 22M  
P.O. Box 826880  
Sacramento, CA 94280-0001.

Copies of all forms completed by the One-Stop Centers, (including the NEO Self-Evaluations, the PPA Self-Assessments, and the PPA Transition Plans) must be kept on file locally to allow for any later inspection that may be required by authorized State and Federal Reviewers.

**LWIA:** \_\_\_\_\_

**Executive Director:** \_\_\_\_\_

**Name of Staff Completing EO Guide:** \_\_\_\_\_

**Telephone Number:** \_\_\_\_\_

**Date Guide Completed:** \_\_\_\_\_

## DESIGNATION OF EQUAL OPPORTUNITY OFFICER

SECTION A: RESPONSES

REFERENCE	ITEMS	RESPONSE		
		Yes	No	Partially
WIA SECTION 188  29 CFR PART 37 §37.23 §37.24 §37.25 §37.26 §37.27 §37.28 §37.54	<p>1. Has the LWIA designated an Equal Opportunity (EO) Officer?</p> <p>Name _____ Title _____</p> <p>Address _____</p> <p>City _____ Zip Code _____</p> <p>Telephone (____)_____ TDD/TTY(____)_____</p> <p>2. Has the name, title/position, address, and telephone number of the EO Officer been made public at the local level?</p> <p>3. If yes, does this information appear on internal and external communications about the LWIA's nondiscrimination and EO programs?</p> <p>4. Is the EO Officer a senior-level employee of the LWIA?</p> <p>5. Do the EO Officer and the EO staff receive periodic training on EO requirements and regulations?</p> <p>6. Do the EO Officer's responsibilities include:</p> <p>a. Serving as the LWIA's liaison with CRC;</p> <p>b. Monitoring and investigating the LWIA's activities, and the activities of its subrecipients to ensure compliance with nondiscrimination and EO obligations under WIA Title I;</p> <p>c. Reviewing the LWIA's written policies to ensure that they are nondiscriminatory;</p> <p>d. Developing and publishing the LWIA's procedures for processing discrimination complaints under §37.76 through §37.79, and ensuring that those procedures are followed;</p> <p>e. Reporting directly to the appropriate official (including, but not limited to, the State WIA Director, State Employment Security Agency Administrator, or LWIA grant recipient) about EO matters;</p> <p>f. Undergoing training (at the LWIA expense) to maintain competency, if the Director requires him or her, and/or his or her staff, to do so?</p>			

**SECTION B: DEFICIENCIES**

**SECTION C: CORRECTIVE ACTION**

## COMMUNICATION OF EQUAL OPPORTUNITY POLICIES AND PROCEDURES

SECTION A: RESPONSES

REFERENCE	ITEMS	RESPONSE		
		Yes	No	Partially
WIA SECTION 188 29 CFR PART 37 §37.5 §37.11 §37.20 §37.26 §37.29 §37.30 §37.31 §37.32 §37.33 §37.34 §37.35 §37.36 §37.54	<p>1. Does the LWIA have a written nondiscrimination and EO policy and notice that:</p> <p>a. Makes a commitment to provide equal opportunities?</p> <p>b. Prohibits discrimination on the grounds of:</p> <p>(1) race;</p> <p>(2) color;</p> <p>(3) religion;</p> <p>(4) sex;</p> <p>(5) national origin;</p> <p>(6) age;</p> <p>(7) disability;</p> <p>(8) political affiliation or belief, and</p> <p>(9) citizenship/status as a lawfully admitted immigrant authorized of any beneficiary or programs funded under Title I of the WIA of 1998?</p> <p>c. Prohibits retaliation or reprisal against an individual that:</p> <p>(1) Has filed a complaint;</p> <p>(2) Opposed a practice prohibited by the nondiscrimination and EO provisions of WIA;</p> <p>(3) Furnished information to, or assisted or participated in any manner in, an investigation, review, hearing, or any other activity related to the administration of the WIA nondiscrimination and EO provisions; and</p> <p>(4) Otherwise exercised any rights and privileges under the WIA nondiscrimination and EO provisions?</p> <p>2. Has the LWIA set up a system to communicate its EO policy?</p> <p>3. Does the LWIA have staff who are knowledgeable of and trained concerning their EO responsibilities?</p> <p>4. Does the LWIA's EO policy, at a minimum, specify that it will give initial and continuing notice that it does not discriminate to:</p> <p>a. Applicants/registrants;</p> <p>b. Eligible applicants/registrants;</p> <p>c. Participants;</p> <p>d. Applicants for employment;</p> <p>e. Employees;</p> <p>f. Unions or professional organizations holding collective bargaining or professional agreements with the LWIA;</p> <p>g. Sub-recipients of WIA Title I Funds;</p> <p>h. Members of the public, including those with impaired vision or hearing?</p>			



## COMMUNICATION OF EQUAL OPPORTUNITY POLICIES AND PROCEDURES

SECTION A: RESPONSES

REFERENCE	ITEMS	RESPONSE		
		Yes	No	Partially
WIA SECTION 188 29 CFR PART 37 §37.9 §37.29 §37.30 §37.31 §37.32 §37.34 §37.35 §37.54	5. Does the LWIA ensure that translators and/or interpreters are qualified to provide interpreting services and understand any confidentiality requirements?			
	6. Does the LWIA's "Equal Opportunity is the Law" notice contain the specific wording required by Title 29 CFR §37.30?			
	7. Has the notice been:			
	a. Posted in prominent numbers and locations at the LWIA?			
	b. Disseminated in the form of internal LWIA memoranda and other written or electronic communication?			
	c. Included in handbooks or manuals?			
	d. Given to each participant and a copy of the notice placed in each participant's file?			
	e. Provided to service providers who are under contract to the LWIA?			
	f. Made available in formats that effectively communicate its message to individuals with visual impairments?			
	8. Do recruitment materials that are distributed to the public for the WIA Title I funded programs state that the programs or activities are "equal opportunity employer/programs" and that "auxiliary aids and services are available upon request to individuals with disabilities?"			
	a. Where a phone number is listed, is there a TDD/TTY or relay service number listed?			
	b. Are recruitment materials printed in a language other than English where a significant portion of the eligible population in the LWIA speaks a language other than English?			
	9. Where a significant portion of the eligible population to be served speaks a language other than English, does the LWIA provide services or information in a language other than English?			

## COMMUNICATION OF EQUAL OPPORTUNITY POLICIES AND PROCEDURES

SECTION A: RESPONSES

REFERENCE	ITEMS	RESPONSE		
		Yes	No	Partially
WIA SECTION 188 29 CFR PART 37 §37.9 §37.29 §37.30 §37.31 §37.32 §37.34 §37.35 §37.54	10. Has the LWIA developed a written policy regarding effective communication with persons of Limited English Proficiency (LEP) to meet EO requirements?			
	11. Does the LWIA inform subcontractors of their obligation to provide language assistance to LEP individuals to whom they give services or enroll in programs and activities?			
	12. Does the LWIA provide its new participants and new employees with an orientation to inform them of their nondiscrimination and equal opportunity rights, including the right to file a complaint?			

**SECTION B: DEFICIENCIES**

**SECTION C: CORRECTIVE ACTION**

**EQUAL OPPORTUNITY PROVISIONS, AND NON DISCRIMINATION  
ASSURANCES IN CONTRACTS, PLANS, AND AGREEMENTS**

**SECTION A: RESPONSES**

REFERENCE	ITEMS	RESPONSE		
		Yes	No	Partially
WIA SECTION 188  29 CFR PART 37 §37.20 §37.21 §37.54  29 CFR, PART 652 §667.275	<p>1. Has the LWIA implemented a system to ensure that all contracts, job training plans, and policies and procedures entered into with respect to the operation of the LWIA's WIA Title 1-funded programs or activities contain the assurances as specified in Title 29 CFR, §37.20?</p> <p>2. Do the LWIA's assurances state that the LWIA will "comply fully with the nondiscrimination and equal opportunity provisions" of WIA and acknowledge the government's right to seek judicial enforcement of the nondiscrimination assurance?</p>			

**SECTION B: DEFICIENCIES**

**SECTION C: CORRECTIVE ACTION**

## UNIVERSAL ACCESS TO WIA TITLE-I FINANCIALLY ASSISTED PROGRAMS AND ACTIVITIES

SECTION A: RESPONSES

REFERENCE	ITEMS	RESPONSE		
		Yes	No	Partially
WIA SECTION 188 29 CFR PART 37 §37.7 §37.8 §37.9 §37.10 §37.42 §37.54	<ol style="list-style-type: none"> <li>1. Has the LWIA taken appropriate steps to ensure that it provides universal access to its WIA Title I-financially assisted programs and activities?</li> <li>2. Does the LWIA's recruitment efforts ensure that the pool of individuals considered for participation in the LWIA's programs and activities includes members of both sexes, various race and ethnicities, age groups, and individuals with disabilities?</li> <li>3. Is the LWIA's hiring process accessible to applicants with disabilities?</li> <li>4. Does the LWIA ensure that facilities utilized by the LWIA for WIA services are designed to provide reasonable access to individuals with disabilities in the following areas: <ol style="list-style-type: none"> <li>a. Training;</li> <li>b. Job structure;</li> <li>c. Work schedule;</li> <li>d. Work procedure; and</li> <li>e. Work equipment and auxiliary aids accommodations?</li> </ol> </li> </ol>			

**SECTION B: DEFICIENCIES**

**SECTION C: CORRECTIVE ACTION**

REFERENCE	ITEMS	RESPONSE		
		Yes	No	Partially
WIA SECTION 188 The Rehabilitation Act of 1973, §504 California Building Code, Title 24 §1117  29 CFR PART 32  29 CFR PART 37 §37.4 §37.5 §37.7 §37.8 §37.9 §37.10 §37.37 §37.41 §37.54	<p>1. Does the LWIA have at least one public telephone accessible to the disabled?</p> <p>2. Has the LWIA established a methodology for ensuring the confidentiality of medical information provided by participants and applicants for employment?</p> <p><b>COMPLETE ADDENDUM:      PHYSICAL AND PROGRAM ACCESS CHECKLIST</b></p>			



**SECTION B: DEFICIENCIES**

**SECTION C: CORRECTIVE ACTION**

## COLLECTION AND MAINTENANCE OF EQUAL OPPORTUNITY DATA

SECTION A: RESPONSES

REFERENCE	ITEMS	RESPONSE		
		Yes	No	Partially
WIA SECTION 188  20 CFR PART 652 §663.105(c)  29 CFR PART 37 §37.11 §37.37 §37.39 §37.41 §37.54	<ol style="list-style-type: none"> <li>1. Has the LWIA implemented a system to collect and maintain records and data necessary to determine its compliance with nondiscrimination and EO provisions? <ol style="list-style-type: none"> <li>a. Is data arranged by race/ethnicity, sex, age, disability status, and primary language?</li> <li>b. Is data arranged by applicants, registrants, eligible applicants/registrants, participants, terminees, applicants for employment, and employees to facilitate assessment of nondiscrimination and EO at each decision point in the LWIA's programs?</li> <li>c. Is data stored in a manner that ensures confidentiality?</li> <li>d. Is data used only for record keeping and reporting, determining applicant eligibility, and determining program compliance with nondiscrimination requirements?</li> <li>e. Is data arranged in such a manner to allow cross-referencing of data to individual records?</li> </ol> </li> <li>2. Has the LWIA implemented a system to respond to discrimination complaints?</li> <li>3. Does the LWIA retain records, including records of complaints, for a period of at least three years from the close of the applicable year or resolution of the complaint?</li> <li>4. Does the LWIA maintain a log of complaints that allege discrimination on the ground(s) of race, color, religion, sex, national origin, age, disability, political affiliation or belief, citizenship, retaliation or reprisal against participants in a Title I- financially assisted program or activity? <ol style="list-style-type: none"> <li>a. Does the log include: <ol style="list-style-type: none"> <li>(1) The name and address of the complainant;</li> <li>(2) The ground for the complaint;</li> <li>(3) A description of the complaint;</li> <li>(4) The date the complaint was filed;</li> <li>(5) The disposition of the complaint; and</li> <li>(6) Other pertinent information.</li> </ol> </li> </ol> </li> </ol>			

**SECTION B: DEFICIENCIES**

**SECTION C: CORRECTIVE ACTION**

## MONITOR SERVICE PROVIDERS FOR COMPLIANCE WITH EO REQUIREMENTS

SECTION A: RESPONSES

REFERENCE	ITEMS	RESPONSE		
		Yes	No	Partially
WIA SECTION 188 29 CFR PART 37 §37.25 §37.51 §37.52 §37.54	<p>1. Has the LWIA implemented a system for periodically monitoring service providers to determine whether they are conducting their WIA Title 1-funded programs and activities in a nondiscriminatory way?</p> <p>2. If yes to 1 above, does the LWIA's annual monitoring review include:</p> <p>a. Analysis of the data and records collected by race/ethnicity, sex, age, and disability status to determine whether differences in rates of application, placement, or termination have practical or statistical significance?</p> <p>b. Where significant differences are found, does the LWIA conduct follow-up investigations to determine, through records review, interviews, and other appropriate investigative techniques, whether the differences are due to discrimination?</p> <p>c. An assessment to determine whether the service provider has fulfilled its administrative obligations with regard to WIA Section 188 and 29 CFR Part 37 (e.g., record keeping, notice and communication, universal access, and complaint processing)?</p> <p>3. How often is EO monitoring performed?</p> <p>a. At least once a year?</p> <p>b. At least once every 2-3 years?</p> <p>c. No EO monitoring of service providers has been conducted.</p> <p>4. Are written monitoring reports completed?</p>			

**SECTION B: DEFICIENCIES**

**SECTION C: CORRECTIVE ACTION**

## COMPLAINT PROCESSING PROCEDURES

SECTION A: RESPONSES

REFERENCE	ITEMS	RESPONSE		
		Yes	No	Partially
WIA SECTION 188 29 CFR PART 37 §37.70 §37.71 §37.72 §37.73 §37.74 §37.75 §37.76 §37.77 §37.78 §37.79 §37.54	<p>1. Has the LWIA adopted and published discrimination complaint procedures for resolving allegations within the LWIA of noncompliance with applicable nondiscrimination and EO provisions?</p> <p>2. Has the LWIA adopted and published discrimination complaint procedures for resolving allegations against service providers of noncompliance with applicable nondiscrimination and EO provisions?</p> <p>3. Do the published discrimination complaint procedures:</p> <p>a. Provide for issuance of a written Notice of Final Action within 90 days of the date on which the complaint is filed which states:</p> <p>(1) Either a statement of the recipient's decision on the issue and an explanation of the reasons underlying the decision, or a description of the way the parties resolved the issue; and</p> <p>(2) The complainant has a right to file a complaint with CRC within 30 days of the date on which the Notice of Final Action is issued if he or she is dissatisfied with the recipient's final action on the complaint, or if there is no final resolution of the complaint within 90 days of the date that the complaint was filed?</p> <p>b. Provide for an initial written notice to the complainant that acknowledges the receipt of the complaint and provides notice that the complainant has the right to be represented in the complaint process?</p> <p>c. Provide for a written statement to the complainant concerning the recipient's accepting or rejecting each issue in the complaint for investigation, and the reasons for each rejection?</p> <p>d. Provide for a fact finding or investigation period of the circumstances underlying the complaint?</p> <p>e. Provide for a period during which the recipient attempts to resolve the complaint and the methods available to resolve the complaint must include alternative dispute resolution?</p>			

## COMPLAINT PROCESSING PROCEDURES

SECTION A: RESPONSES

REFERENCE	ITEMS	RESPONSE		
		Yes	No	Partially
WIA SECTION 188 29 CFR PART 37 §37.70 §37.71 §37.72 §37.73 §37.74 §37.75 §37.76 §37.77 §37.78 §37.79 §37.54 §37.94	<p>4. Has the LWIA established a system to record discrimination complaints?</p> <p>5. Do the LWIA's discrimination complaint processing procedures specify the following:</p> <ul style="list-style-type: none"> <li>a. who may file;</li> <li>b. where to file;</li> <li>c. time frames;</li> <li>d. what the complaint should include;</li> <li>e. due process elements, and</li> <li>f. appropriate sanctions?</li> </ul>			

**SECTION B: DEFICIENCIES**

**SECTION C: CORRECTIVE ACTION**



## CORRECTIVE ACTIONS/SANCTIONS

SECTION A: RESPONSES

REFERENCE	ITEMS	RESPONSE		
		Yes	No	Partially
WIA SECTION 188 29 CFR PART 37 §37.54	1. Has the LWIA established procedures for obtaining prompt corrective action when noncompliance is found?  2. Has the LWIA established a procedure for administering sanctions when noncompliance is found?			

**SECTION B: DEFICIENCIES**

**SECTION C: CORRECTIVE ACTION**

# **THE CALIFORNIA PHYSICAL AND PROGRAM ACCESS SELF-ASSESSMENT PROCESS**

**DEVELOPED COLLABORATIVELY BY THE  
UNIVERSAL ACCESS WORKGROUP (UAWG),  
A SUB-COMMITTEE OF THE  
CALIFORNIA WORKFORCE INVESTMENT BOARD.\***

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\* Membership on the UAWG includes representatives from State partner entities such as the Employment Development Department, the Department of Rehabilitation, the Department of Social Services, the California Community Colleges, and the California Workforce Investment Board. The UAWG is chaired by Dr. Catherine Campisi, Director of the California Department of Rehabilitation.

*The self-assessment process can be used by any facility, including businesses, that provides services to the public. The process includes checklists and strategies for setting physical/program access goals, identifying strengths and weaknesses, and developing transition plans to correct deficiencies. It also provides resources that can assist facilities in their efforts to improve access for all Californians.*

# **THE CALIFORNIA PHYSICAL AND PROGRAM ACCESS SELF-ASSESSMENT PROCESS**

## **INSTRUCTIONS**

This California Physical and Program Access (PPA) Self-Assessment Process Addendum details the requirements of Element Five of the Nondiscrimination and Equal Opportunity (NEO) Self-Evaluation Guide (SEG). The Addendum is comprised of two major parts: Part 1 is the Self-Assessment Tool which includes a compliance checklist, a goal planning worksheet, and a transition plan to correct deficiencies; Part 2 is the PPA Self-Assessment One-Stop Summary which includes a form for listing the Local Workforce Investment Area's (LWIA) One-Stop Centers, and a summary of the One-Stop Centers' non-compliance and proposed remedies. The LWIA is responsible for completing Part 2 from the information contained in the One-Stop Centers' documentation, and submitting it to the Compliance Review Division (CRD). Full submission instructions may be found in the NEO SEG, page 5.

The Department of Rehabilitation (DOR) provides free training and technical assistance to LWIA and One-Stop Center staff responsible for completing the Self-Assessment Process. Please refer to Workforce Investment Act (WIA) Directive WIAD02-15 and Attachment 3 (DOR Catalogue of Services) to the Directive for further information.

## **ADDENDUM - PART 1: PPA SELF-ASSESSMENT TOOL**

Section A of the PPA Self-Assessment Tool discusses universal access under the WIA, the roles that both facilities and programs play in achieving universal access, definitions of physical and program access, necessary areas of compliance, and the broader goals that compliance should help achieve. Section A contains valuable information that will assist in understanding the purpose and goals of universal access, compliance, and the self-assessment process and should be read in its entirety before conducting the self-assessment.

Section B provides more detailed instructions for completing the Self-Assessment. This section discusses whom, and how many, should participate in the self-assessment process, how to prepare for it, how to involve the public in the process, and how the self-assessment relates to the Transition Plan.

Section C presents the PPA checklists. These must be completed for both the LWIA administrative office and for each of its One-Stop Centers. The information for the One-Stop Centers obtained through this process is carried forward into the Addendum - Part 2.

Section D provides both a template and instructions for goal planning, and a template and instructions for completing the Transition Plan. The information for the One-Stop Centers obtained through these processes is also carried forward into the Addendum - Part 2.

Section E provides resources for assessment and transition planning.

## **ADDENDUM - PART 2: PHYSICAL AND PROGRAM ACCESS SELF-ASSESSMENT ONE-STOP SUMMARY**

Instructions for completion of the Addendum - Part 2 precede the two sections which the LWIA must complete and return to the CRD.

Section 1 contains a form for the LWIA to identify each of its One-Stop Centers by name, location, and type. It is also used to show which One-Stop Centers are or are not in compliance with PPA requirements. Although only One-Stop Centers not in compliance are reportable, CRD requires positive confirmation on this page for those with no PPA deficiencies.

Section 2 is the Summary of Noncompliance. The Identification Number (ID #) is carried over from the left column of Section 1. Only those One-Stop Centers that have been identified as having PPA deficiencies should be included in this summary. Information from the documentation submitted by the One-Stop Centers is summarized in this section, and includes identification of the Access Element, its current status, a short summary of the Transition Plan, and an anticipated completion date.

# ADDENDUM – PART 1

## SECTION A: UNIVERSAL ACCESS

### ACCESS UNDER THE WIA

The Workforce Investment Act (WIA) requires that both workforce investment and workforce investment-related services be provided to the public through local One-Stop service delivery systems. At a minimum, the three WIA programs (Youth, Adult, and Dislocated Workers), and some 15 other workforce programs (including Wagner-Peyser Act and Rehabilitation Act services), are required to be available through each of the local One-Stop systems. One-Stop systems must also provide universal access to the core employment-related services offered by all of these programs. “Information about job vacancies, career options, student financial aid, relevant employment trends, and instruction on how to conduct a job search, write a resume, or interview with an employer is available to any job seeker in the U.S., or anyone who wants to advance his or her career.”<sup>1</sup>

Universal access applies to all individuals seeking employment assistance, including persons with disabilities. The WIA makes it clear that recipients of WIA funds, including One-Stop Operators and Local Workforce Investment Areas (LWIAs), are obligated to provide physical and program access as required under both the Rehabilitation Act of 1973 and the Americans With Disabilities Act (ADA) of 1990.<sup>2</sup>

Title II of the ADA took effect in 1992. It prohibits all state and local governmental agencies from discriminating against persons with disabilities and from excluding participation in, or denying benefits of programs, services, or activities to persons with disabilities. California LWIAs and One-Stop Centers must meet the physical and program access standards in law, including Title 24 of the California Building Code (CBC) and the ADA Title II Accessibility Guidelines (ADAAG). The ADAAG provides scope and technical requirements for accessibility to buildings and facilities under the ADA. It gives details and measurements for making facilities physically accessible. Title 24 is part of the CBC that deals with access compliance issues and may require a higher level of accessibility than that required by the ADAAG.

If it is determined that LWIA offices or any of their One-Stop Centers are not in compliance with these standards, the LWIA and/or the One-Stop Operator must take actions to remove physical and/or program barriers in order to comply. Achieving compliance with the CBC Title 24 and ADAAG Title II is required by law. More importantly, such compliance is a key step in fulfilling the WIA concept of universal access by creating an atmosphere in One-Stop Centers that is welcoming and inviting to all individuals in the community, including persons with disabilities.

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<sup>1</sup> 20 CFR, Background, page 49294.

<sup>2</sup> 20 CFR, 667.275, page 49429

## PHYSICAL AND PROGRAM ACCESS

Two terms that are commonly used when discussing the accessibility of services are “physical access” and “program access.” Neither of these terms, however, has commonly accepted definitions. In order to assist State- and local-level policy makers in better understanding One-Stop Center access issues for persons with disabilities, the Physical and Program Access (PPA) Self-Assessment Process uses the following definitions of these two terms:

- *Physical access is the act or opportunity of approaching or entering a physical space or area, including a site, building, or facility, or parts thereof.*
- *Program access is the act or opportunity of participating in and benefiting from programs and services.*

These terms are not mutually exclusive. For instance, special devices and auxiliary aids, as well as other forms of assistive technology, might reasonably fit under either definition. Physical access generally refers to both the physical space, and the physical equipment necessary for an individual to approach or enter the physical space, in which the program or service activity is available. Examples of building elements that can have physical access issues include areas from the point of arrival through the interior of the facility, and encompass parking, passenger drop-off and loading zones, exterior routes of travel, entrances and exits, walks and sidewalks, curb ramps, ramps, stairs, elevators, access lifts, doors and gates, access to and through rooms and spaces, restrooms, signs, alarms, and equipment such as computer desks or tables or the placement of chairs.

Program access generally refers to the ways in which information, programs, and services are presented and delivered, allowing individuals to interact with and fully benefit from them. Printed information, computer systems and programs, telephone devices for persons with hearing impairments, and the oral delivery of instructions or information are all program access items.

## PHYSICAL AND PROGRAM ACCESS GOALS

Achieving compliance with the CBC Title 24 and the ADAAG Title II is the first step towards barrier removal in the One-Stop Centers. In California, however, the One-Stop Centers should establish physical and program access goals at a level above minimum compliance as required by the CBC Title 24 or ADAAG Title II, whichever is stricter. Preferred goals are enhancements or improvements to building and service features that go beyond the minimum standards required by law. Setting such goals achieves important quality of life upgrades to facilities and services, resulting in universal benefit to all One-Stop Center customers, and providing truly welcoming and easily accessible facilities and services for any customer seeking services.

For planning purposes, facilities should establish goals for the different elements of both physical and program access. In order to facilitate that process, the facility may use the template entitled “Preferred Access Goals for California One-Stop Centers.” A sample of this template is provided at the beginning of *Section D: Transition Plan*. Goal planning should occur as the first step in the transition planning process. LWIAs and One-Stop Centers should submit their goals for physical and program access along with their completed Transition Plans.

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# **ADDENDUM – PART 1**

## **SECTION B: PHYSICAL AND PROGRAM ACCESS SELF-ASSESSMENT PROCESS AND INSTRUCTIONS**

The purpose of the self-assessment process is to assist Local Workforce Investment Areas (LWIA) and One-Stop Centers in determining whether or not they are in compliance with physical and program access requirements and whether or not the environment for all members of the community who may wish to access services is comfortable and welcoming. The self-assessment process allows providers to monitor their own progress toward true universal access and to report that progress to the State. The process also provides guidelines for compliance, as well as training and technical assistance that may be necessary in order for providers to achieve their goals.

The Physical and Program Access Self-Assessment Tool has been designed to assist the LWIAs and One-Stop Centers in making these determinations by incorporating the access requirements of the California Building Code (CBC) Title 24 and the Americans with Disabilities Act Accessibility Guidelines (commonly known as the ADAAG). Where the CBC Title 24 requirements are stricter, these have been incorporated. The Self-Assessment Tool is not a detailed or necessarily comprehensive survey, but is a general guideline to follow in determining and reporting the level of compliance and in identifying barriers. This tool not only aids in documenting compliance, but should help LWIAs and One-Stop Centers in becoming aware of what access problems may exist in their facilities and programs, to report those problems to the State, and to develop Transition Plans in order to correct deficiencies and improve access.

LWIA Equal Opportunity (EO) Officers are responsible for completing the self-assessments at the LWIA level, and responsible for ensuring that each of the One-Stop Centers and other Workforce Investment Act providers identify persons responsible for completing the self-assessments for their individual facilities. The State will provide training to local EO Officers and One-Stop Center staff responsible for doing the self-assessments. The training provides detailed instructions for completing each section of the Self-Assessment Tool and staff will have the opportunity to ask questions and raise issues concerning their particular facilities. The State will also make technical assistance available for LWIAs and One-Stop Centers during the time in which they complete self-assessments and develop transition plans. Finally, this Guide contains a suggested list of resources in Section E that LWIAs and One-Stop Centers may use in seeking advice and additional help in completing both the Self-Assessment and the Transition Plan.

### **PUBLIC INPUT FROM THE PERSONS WITH DISABILITIES**

LWIAs and One-Stop Centers should involve persons with disabilities in both the self-assessment and the transition planning processes. Other interested persons or organizations should also be provided opportunities to participate in the self-assessment and transition planning processes. The experience of many communities

confirms that cooperation between persons with disabilities and governmental entities can lead to creative problem solving, improved communications, and mutual understanding. In addition, involving persons with disabilities in decision-making will strengthen the accountability of the process and ensure wise use of limited public resources.

Some suggestions for identifying community members to assist with providing input are:

- Placing notices in local newspapers or on the radio asking local individuals or organizations to participate;
- Publishing information in handbooks, manuals, and pamphlets that are distributed to the public to describe programs and activities;
- Displaying informative posters in the One-Stop centers and other public places;
- Contacting Independent Living Centers in your area to request input and feedback;
- Contacting the California State Department of Rehabilitation, Disability Access Section, (916) 263-8674 voice, (916) 263-8672 TTY, (916) 263-8671 fax; and
- Contacting the regional Disability and Business Technical Assistance Center located at 2168 Shattuck Avenue, Suite 301, Berkeley, CA 94704 ([510] 848-2980 voice, [510] 848-1840 TTD, or [510] 848-1981 fax.)

Note that any solicitation for public input from persons with disabilities should comply with the Title II requirements for effective communication, which include providing the information in alternate formats.

## **THE PHYSICAL AND PROGRAM ACCESS CHECKLISTS**

Section C is a pullout section that contains the checklist for both physical and program access. This section should be “pulled out” and duplicated so that it can be used throughout the facility as the self-assessment is conducted. The left-hand column contains access elements that include legal citations and questions that must be answered in various, general review areas. The right-hand column contains possible solutions for any questions with negative responses. It should be noted again that conducting this self-assessment is only a first step in a facility’s efforts to comply with the law and to provide a protected, welcoming, universally accessible, and easy-to-navigate environment. When the self-assessment and the checklists are completed, any deficiencies can easily be transferred into the Transition Plan.

In preparing to conduct the self-assessment, staff should start by reviewing the building floor plans. During the self-assessment itself, if plans are not available, graph paper can be used to sketch the layout of all interior and exterior spaces in the facility. Notes should be made on the sketch or plan while the self-assessment is being conducted. It will be necessary to bring multiple copies of the checklists, along with a flexible steel tape measure, a tool to measure percentage of slope (such as *SmartTool*), and a door pressure gauge. As many as three or more people may have to work as a team to conduct the self-assessment, with one person responsible for numbering key items on the floor plan to match with the field notes, another to write the field notes, and another

to take the necessary measurements. However many people conduct the self-assessment, they must possess the necessary expertise and knowledge regarding both physical and program access. Two or three additional people, with various disabilities, should be invited to assist in the self-assessment process to help identify barriers, develop solutions for removing these barriers, and set priorities for implementing improvements.

We strongly encourage you to attend the sessions on using the tool and the modules entitled “Program Access for Customers with Disabilities” and “Access to Employment Programs and Services.” You may contact Dee Whitecotton at (916) 263-0597 to schedule this for your area.

If the survey is performed and severe or complex physical accessibility problems are found, then the facility may want to consult with a facilities expert, architect, or expert in assistive technology. At that point, the expert would have to conduct a more in-depth assessment in order to deal with multiple or difficult issues, but this would not necessarily affect the completion of the two checklists.

When the checklists are completed, they must be signed by the EO Officer or other person responsible for completing the self-assessment. See the transmittal letter to this package and the Submission Instructions, page 5 of the Nondiscrimination and Equal Opportunity Self-Evaluation Guide for submittal and filing instructions.

## **ADDITIONAL COMMENTS ON PROGRAM ACCESS**

When customers of a One-Stop Center enter the facility, they reasonably expect that all programs and services will be available to and accessible by them, regardless of who they are or what barriers to participation they may have. For instance, customers who are blind anticipate that written materials provided to all customers will be made available in alternate formats such as Braille, electronic text, or audiocassette.

Full access to programs and services is a dynamic process that requires ongoing, proactive assessment, change, and modification as needed. The guidelines listed below are not meant to be comprehensive. Instead, they are intended to serve as a starting point when addressing issues related to program accessibility in the subject facility. Staff who are responsible for ensuring compliance in the LWIA offices or a One-Stop Center should continually evaluate and revise these guidelines and should consult with customers, community partners, and the general public for input.

- When and where possible, subject facilities should pursue alternatives to structural changes in order to achieve program accessibility. Nonstructural alternatives include acquisition or redesign of equipment, assignment of facility staff to customers, and provision of services at alternate, accessible sites.
- When choosing methods of providing program access, facilities should give priority to the ones that result in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities.

- Facilities, particularly One-Stop Centers, should develop a desktop community resource manual for staff to use when attempting to determine how best to meet the needs of customers with disabilities. The manual should include information on local Braille Translation services, interpreter services for the deaf, and speech communication service providers (voicers) for customers whose disabilities affect their ability to communicate orally with others. Additional resources should be considered to address the needs of all disability categories.
- Emergency evacuation plans should be provided to customers in their preferred language and preferred communication medium: e.g., Braille, audio cassette, videotape with closed captioning, etc.
- LWIA and One-Stop Center staff should receive training at regular intervals on disability awareness and sensitivity to promote a welcoming environment and to ensure compliance with the recent changes in the law.

## **PUBLIC TRANSPORTATION DROP-OFF POINTS**

If a public transportation drop-off point is in the vicinity of the facility and has the potential to bring disabled customers to the building to receive services, accessibility from these points should be reviewed. The person designated responsible for the self-assessment should conduct this review. Attention should be given to areas within one-fourth of a mile radius between the public transportation drop-off points and the facility being assessed. These areas include but are not limited to public sidewalks, streets, crosswalks, and curbs. Persons with disabilities should assist in this review to help identify barriers.

If problems are found that are outside the facility's realm of responsibility, such as public sidewalks or streets, the LWIA or the One-Stop Operator should submit a letter to the local city or county entity responsible for the public walkways. The letter should contain an explanation of the services provided by the facility to persons with disabilities and should include both a listing (including location) and photographs of the barriers. In addition, the letter should include a request to the local governmental entity to repair or remove the barriers. The LWIA or the One-Stop Operator should retain a copy of the letter along with the Transition Plan in order to show that a good faith effort was made to resolve barriers affecting the path of travel to the facility in question.

**If the local governmental entity responsible for the public walkways is unable or refuses to correct the barriers, other alternatives can be considered such as:**

- Offering an equivalent facilitation, which may include bringing the services provided by the facility to the client (other options may be meeting the client at the public transportation drop-off point and assisting with access into the building, or advising the client to use a more accessible facility in the area);
- Working with the local jurisdiction in an attempt to improve the situation (e.g., asking that buses be rerouted so stops are closer to the building or are on a more accessible path of travel to the building);

- Developing an exemption process or claiming an unreasonable hardship for inaccessible public walkways (an equivalent facilitation should still be available to the persons with disabilities using the facility and every attempt should be made to work towards accessibility); and
- Relocating the facility to a more accessible site.

# ADDENDUM – PART 1

## SECTION C: COMBINED PHYSICAL/PROGRAM ACCESS CHECKLIST

This checklist combines both physical and program access elements that the Local Workforce Investment Area (LWIA) offices and One-Stop Centers must assess. This may only be the first step in the effort to make the facilities and programs universally accessible by all potential customers. Where deficiencies are found, further review and exploration, with architects and other experts, may be required in order to fully understand and respond to specific, detailed requirements. Also, other, more detailed checklists may be used to supplement the Physical and Program Access checklist. The resource list in Section E provides information about other, more detailed checklists that are available.

The checklist is divided into nine broad access elements that cover the basics of both physical and program access requirements. Each element is broken down into one or more sub-elements, or specific factors that must be addressed.

The first column lists all of these elements and sub-elements, as well as where the element and sub-element requirements can be found in law. The sub-elements are listed as questions, which require simple “yes” or “no” answers. To the right of the sub-element, in the second column, the checklist provides possible solutions if the answer in column one is a “no.” In completing the checklist, all questions should be answered and the “possible solutions” checked off as appropriate.

The full checklist is available electronically as a Microsoft Word table that LWIAs and One-Stop Centers may duplicate for their own use. Although this checklist must be completed and submitted, along with the goal planning worksheet and the Transition Plan (see Section D), LWIAs and One-Stop Centers may use other, more detailed checklists as working documents during their self-assessments (see resource list in Section E).

## Combined Physical/Program Access Checklist

Facility Name: \_\_\_\_\_

ACCESS ELEMENT A: INTEGRATED PROGRAMS	POSSIBLE SOLUTIONS
<p><b>The integration of individuals with disabilities into the mainstream of society is fundamental to the purposes of the Americans with Disabilities Act and the provision of services.</b></p> <p><b>Integrated Benefits and Services</b></p> <p>1. Do all of your policies and practices provide services and benefits to individuals with disabilities in an integrated manner? <i>Example: You may also offer separate programs where necessary to assure that the program is equally effective for individuals with disabilities.</i></p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>2. Has all of your staff received disability awareness training and are they aware of a process to offer accommodations in order to provide accessibility to programs and services?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p><b>Right to Choose</b></p> <p>3. Do your policies and practices allow an individual with a disability to choose to participate in the regular program, even if a separate program is permitted? <i>Example: It would not be a violation for a One-Stop Center partner to offer training programs designed for participants with cognitive disabilities, but it would a violation if the One-Stop Center partner refused to allow participants with cognitive disabilities to participate in its other training programs.</i></p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> The policy and practice will be developed and implemented by: _____ (date)</p> <p><input type="checkbox"/> Disability awareness training will be developed by: _____ (date)</p> <p><input type="checkbox"/> The policy and practice will be developed and implemented by: _____ (date)</p>

## Combined Physical/Program Access Checklist

Facility Name: \_\_\_\_\_

<b>ACCESS ELEMENT A (cont.)</b>	<b>POSSIBLE SOLUTIONS</b>
<p>4. Are all staff aware that it may be necessary to provide a reasonable accommodation to enable individuals with disabilities to participate in and benefit from the program?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p><b>Requesting Accommodations</b></p> <p>5. Do you have a process to offer reasonable accommodations in order to provide accessibility to programs and services?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p><b>Right to Refuse</b></p> <p>6. Do your policies and practices allow an individual with a disability to choose not to accept a reasonable accommodation or benefit?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p><b>Surcharges and Additional Requirements</b></p> <p><i>One-Stops may not impose extra charges upon individuals with disabilities to cover the costs of effective communication, reasonable accommodations or access features, and may not impose any additional requirements or burdens on individuals with disabilities that they do not require of all other participants in the program.</i></p> <p>7. Are there any circumstances in which an individual with a disability would be asked to pay a fee or meet any other requirements not imposed on other program participants?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> The policy and practice will be developed and implemented by: _____ (date)</p> <p><input type="checkbox"/> The policy and practice will be developed and implemented by: _____ (date)</p> <p><input type="checkbox"/> The policy and practice will be developed and implemented by: _____ (date)</p> <p><input type="checkbox"/> The policy to remove such practice will be developed and implemented by: _____ (date)</p>



## Combined Physical/Program Access Checklist

Facility Name: \_\_\_\_\_

<b>ACCESS ELEMENT B: ACCESSIBLE APPROACH AND ENTRANCE</b>	<b>POSSIBLE SOLUTIONS</b>
<p><b>People with disabilities should be able to arrive on site, approach a building, and enter as freely as everyone else. At least one route of travel should be safe and accessible to everyone.</b></p> <p><b>Route of Travel (Title 24 1114B.1.2, 1120B)</b></p> <p>8. Is there a route of travel that does not require the use of stairs?  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>9. Is the route stable, firm and slip-resistant?  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>10. Is the route at least 48 inches wide?  Width: _____  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>11. Can all objects protruding more than 4 inches into circulation paths be detected by someone with a visual disability using a cane?  Distance from wall: _____  Height: _____  <i>To be detected with a cane, an object must be within 27 inches of the ground. Objects hanging or mounted overhead must be higher than 80 inches to give clear headroom.</i>  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>12. Do curbs on the route have cut outs at drives, parking, and drop-offs?  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>13. Is the cross slope 2.0% or less?  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<div style="margin-bottom: 10px;"> <input type="checkbox"/> Add a ramp.  <input type="checkbox"/> Add an alternative route on level ground. </div> <div style="margin-bottom: 10px;"> <input type="checkbox"/> Repair uneven paving.  <input type="checkbox"/> Fill small bump/breaks with beveled patches.  <input type="checkbox"/> Replace gravel with hardtop. </div> <div style="margin-bottom: 10px;"> <input type="checkbox"/> Change/move landscaping, furnishings or other features.  <input type="checkbox"/> Widen route.  <input type="checkbox"/> Move/remove protruding objects  <input type="checkbox"/> Add a cane-detectable base that extends to the ground.  <input type="checkbox"/> Place a cane-detectable object on the ground underneath as a warning barrier. </div> <div style="margin-bottom: 10px;"> <input type="checkbox"/> Install curb cuts. </div> <div style="margin-bottom: 10px;"> <input type="checkbox"/> Add small ramp up to the curb </div>

## Combined Physical/Program Access Checklist

Facility Name: \_\_\_\_\_

ACCESS ELEMENT B (cont.)	POSSIBLE SOLUTIONS
<p><b>Ramps (Title 24 1133B.5) “Ramp” is defined as a slope of greater than 5%.</b></p> <p>14. Are slopes of ramps no greater than 1:12 or 8.33%? <i>(Slope is a ratio of height to length. 1:12 means for every 12 inches along the base of a ramp, the height increases 1 inch. For a 1:12 maximum slope, at least one foot of ramp length is needed for each inch of height.)</i></p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>15. Do all ramps longer than 6 feet have railings on both sides, where rise is more than 6” or run is longer than 72”?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>16. Are railings sturdy and between 34 and 38 inches high? Height: _____</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>17. Is the width between railings and curbs at least 48 inches? Width: _____</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>18. Are ramps non-slip?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>19. Is there a 5-foot-long level landing at each 30-foot horizontal length of ramp, at the top and bottom of ramps and at switchbacks? Length: _____</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>20. Is the ramp rise no more than 30 inches between landings? Rise: _____</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>21. Are cross slopes no higher than 1:50 or 2.0%?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Lengthen ramp to decrease slope.</p> <p><input type="checkbox"/> Relocate ramp.</p> <p><input type="checkbox"/> If space is limited, reconfigure ramp to include switchbacks.</p> <p><input type="checkbox"/> Add railings.</p> <p><input type="checkbox"/> Adjust height of railing if not between 34 and 38 inches.</p> <p><input type="checkbox"/> Secure handrails in fixtures.</p> <p><input type="checkbox"/> Relocate the railings.</p> <p><input type="checkbox"/> Install a ramp with a width of at least 48" between the inside of the handrails.</p> <p><input type="checkbox"/> Add non-slip surface material.</p> <p><input type="checkbox"/> Remodel or relocate the ramp.</p> <p><input type="checkbox"/> Remodel or relocate ramp</p> <p><input type="checkbox"/> Remodel or relocate ramp.</p>

## Combined Physical/Program Access Checklist

Facility Name: \_\_\_\_\_

ACCESS ELEMENT B (cont.)	POSSIBLE SOLUTIONS								
<p><b>Parking and drop-off Areas (ADAAG 4.6; Title 24 1129B, 1131B)</b></p> <p>22. Are an adequate number of accessible parking spaces available, 9 feet wide for car plus 5 feet wide access aisle?  <input type="checkbox"/> Yes      <input type="checkbox"/> No            Number of car accessible spaces: _____</p> <p>23. Are 9-foot wide spaces with minimum 8-foot wide access aisles and 8-feet 2-inches of vertical clearance available for lift-equipped vans?  <input type="checkbox"/> Yes      <input type="checkbox"/> No            Number of van accessible spaces: _____            Width of access aisle: _____            Vertical clearance: _____</p> <p>24. Are access aisles with no pathway behind vehicles part of the access route to the accessible entrance?  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>25. Are accessible spaces closest to accessible entrance?  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>26. Are accessible spaces marked with an identification sign? Are van spaces marked as "Van Accessible"? Are passenger zones identified with the International Symbol of Accessibility?  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Reconfigure a reasonable number of spaces by repainting stripes.</p> <p><i>The following number of total accessible parking spaces are required for the number of vehicles indicated:</i></p> <table style="margin-left: 40px; border: none;"> <tr> <td style="padding-right: 20px;">1-25</td> <td>1 van space</td> </tr> <tr> <td>26-50</td> <td>2 including 1 van space</td> </tr> <tr> <td>51-75</td> <td>3 including 1 van space</td> </tr> <tr> <td>76-100</td> <td>4 including 1 van space</td> </tr> </table> <p><i>For lots over 100 spaces, refer to Section E, Resource List for further information.</i></p> <p><input type="checkbox"/> Reconfigure to provide van-accessible space(s).</p> <p><input type="checkbox"/> Add curb ramps.  <input type="checkbox"/> Reconstruct sidewalk.</p> <p><input type="checkbox"/> Reconfigure spaces.</p> <p><input type="checkbox"/> Install signs in parking lots.  <input type="checkbox"/> Add or update signs and place so cars do not obstruct them.</p>	1-25	1 van space	26-50	2 including 1 van space	51-75	3 including 1 van space	76-100	4 including 1 van space
1-25	1 van space								
26-50	2 including 1 van space								
51-75	3 including 1 van space								
76-100	4 including 1 van space								

## Combined Physical/Program Access Checklist

Facility Name: \_\_\_\_\_

<b>ACCESS ELEMENT B (cont.)</b>	<b>POSSIBLE SOLUTIONS</b>
<p>27. Is there a policy to ensure only those who need them use accessible spaces?  <input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p><b>Entrance (ADAAG 4.13, 4.14, 4.5; Title 24 1114B, 1120B, 1124B, 1133B)</b></p> <p>28. If there are stairs at the main entrance, is there a ramp or lift, or other accessible entrance?  <input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>29. Do all inaccessible entrances have signs giving the location of the nearest accessible entrance?  <input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>30. Can the alternate entrance be used independently?  <input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>31. Does the entrance door have at least 32 inches clear opening (at least one 32-inch leaf on a double door)?  <input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>32. Is there at least 18 inches of clear wall space on pull side of a door (24 inches preferred), next to handle? Clear space: _____  <input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>33. Is there a threshold edge 1/4 inch high or less, or beveled edge from 1/4 to 1/2 inch high? Height: _____  <input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>34. Are carpeting or mats a maximum of 1/2 inch high? Height: _____  <input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>35. Are edges securely installed to minimize tripping hazards?  <input type="checkbox"/> Yes                      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implement policy and check periodically for violations and report them to the proper authorities.</p> <p><input type="checkbox"/> If the main entrance cannot be made accessible, create a dignified alternate accessible entrance.</p> <p><input type="checkbox"/> Install signs so people do not have to retrace the approach.</p> <p><input type="checkbox"/> As much as possible, eliminate the need for aid to answer a doorbell, operate a lift.</p> <p><input type="checkbox"/> Widen the door to 32 inches clear.  <input type="checkbox"/> Install offset (swing-clear) hinges.</p> <p><input type="checkbox"/> Remove or relocate furnishings.  <input type="checkbox"/> Move door.  <input type="checkbox"/> Add power-assisted or automatic door opener.</p> <p><input type="checkbox"/> If there is a single step with a rise of 6 inches or less, add a short ramp.  <input type="checkbox"/> If the threshold is greater than 1/2 inch high, remove it or modify to be a ramp.</p> <p><input type="checkbox"/> Replace or remove mats.</p> <p><input type="checkbox"/> Secure carpeting or mats at edges.</p>

## Combined Physical/Program Access Checklist

Facility Name: \_\_\_\_\_

<b>ACCESS ELEMENT B (cont.)</b>	<b>POSSIBLE SOLUTIONS</b>
<p>36. Is the door handle no higher than between 30 to 44 inches high and operable with a closed fist? Height: _____  <input type="checkbox"/> Yes      <input type="checkbox"/> No  <i>The closed-fist test for handles and controls: Try opening the door or operating the control using only one hand held in a fist. If you can do it, so can a person with limited use of hands.</i></p> <p>37. Is the door pressure 8.5 pounds or less? Force: _____  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>38. If the door has a closer, does it take at least 3 seconds to close? Time in seconds: _____  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>39. Does the entrance door have an automatic power door opener?  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Lower handle.  <input type="checkbox"/> Replace inaccessible knobs with a lever or loop handle.  <input type="checkbox"/> Retrofit with an add-on lever extension.</p> <p><input type="checkbox"/> Adjust door closures and oil the hinges.  <input type="checkbox"/> Install power-assisted or automatic door openers.</p> <p><input type="checkbox"/> Install lighter doors.  <input type="checkbox"/> Adjust door closer.</p> <p><input type="checkbox"/> Install automatic door openers.</p>

## Combined Physical/Program Access Checklist

Facility Name: \_\_\_\_\_

<b>ACCESS ELEMENT C: ACCESS TO PROGRAMS AND SERVICES</b>	<b>POSSIBLE SOLUTIONS</b>
<p><b>Ideally, the layout of the building should allow people with disabilities to obtain materials and services without assistance.</b></p> <p><b>Horizontal Circulation (Title 24 1118B, 1120B, 1133B)</b></p> <p>40. Does the accessible entrance provide direct access to the main floor, lobby or elevator?  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>41. Are all public spaces on an accessible route of travel?  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>42. Is the accessible route to public spaces at least 36 inches wide? Width: _____  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>43. Is there a 5-foot circle or T-shape for turning a wheelchair completely?  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p><b>Doors (Title 24 1133B)</b></p> <p>44. Do all doors have at least a 32-inch clear opening?  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>45. On the pull side of doors, next to the handle, is there at least 18 inches of clear wall space (24 inches preferred) so a person using a wheelchair can get near to open the door? Space: _____  <input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Add ramps or lifts.</p> <p><input type="checkbox"/> Make another entrance accessible.</p> <p><input type="checkbox"/> Provide access to all public spaces along an accessible route of travel.</p> <p><input type="checkbox"/> Move furnishings such as tables, chairs, display racks, vending machines and counters to make more room.</p> <p><input type="checkbox"/> Rearrange furnishings, displays and equipment.</p> <p><input type="checkbox"/> Identify/widen/replace doors.</p> <p><input type="checkbox"/> Reverse the door swing if safe to do so.</p> <p><input type="checkbox"/> Move/remove obstructing partitions.</p> <p><input type="checkbox"/> Rearrange furnishings, displays and equipment.</p>

## Combined Physical/Program Access Checklist

46. Can doors be opened without too much force (5lb. force maximum for interior doors)?

☐ Yes

☐ No

☐ Install power-assisted or automatic door openers.

☐ Adjust or replace closers.

☐ Install lighter doors.

Facility Name: \_\_\_\_\_

<b>ACCESS ELEMENT C (cont.)</b>	<b>POSSIBLE SOLUTIONS</b>
<p>47. Are door handles between 30 - 44 inches high or less and operable with a closed fist? Height: _____ <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Lower handles. <input type="checkbox"/> Replace inaccessible knobs or latches with lever or loop handles. <input type="checkbox"/> Retrofit with add-on levers <input type="checkbox"/> Install power-assisted or automatic door openers.</p>
<p>48. Are all threshold edges 1/4 inch high or less, or beveled from 1/4 to 1/2 inch high? Height: _____ <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><b>Rooms &amp; Spaces (ADAAG 4.4.2; Title 24 1004.4.3.2.2, 1118B.3, 1121B, 1124B.3, 1133B.3.1)</b></p>	<p><input type="checkbox"/> If there is a threshold greater than 1/2 inch high, remove it or modify to be a ramp. <input type="checkbox"/> If between 1/4 and 1/2 inch high, add bevels to both sides.</p>
<p>49. Are all aisles and pathways to materials and services at least 36 inches wide? Width: _____ <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Rearrange furniture and fixtures to clear aisles.</p>
<p>50. Is carpeting low-pile, tightly woven and securely attached along edges? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Secure edges on all sides. <input type="checkbox"/> Replace carpeting.</p>
<p>51. In circulation paths through public areas, are all obstacles cane-detectable (within 27 inches of the floor or higher than 80 inches, or protruding less than 4 inches, from the wall)? Width: _____ Protusion: _____ <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><b>Emergency Egress (Title 24 1114B.2.4, 1114B.2.2.5)</b></p>	<p><input type="checkbox"/> Remove obstacles. <input type="checkbox"/> Install furnishing, planters or other cane - detectable barriers underneath.</p>

## Combined Physical/Program Access Checklist

<p>52. Are emergency systems (fire alarms, smoke detectors, etc.) provided?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Install visible and audible alarms.</p>
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Facility Name: \_\_\_\_\_

ACCESS ELEMENT C (cont.)	POSSIBLE SOLUTIONS
<p>53. If emergency systems are installed, do they have both flashing lights and audible signals?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Install flashing lights and audible signals.</p>
<p>54. Are exit doors clearly marked?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p><b>Signage for Programs &amp; Services (Title 24 1117B.5; ADAAG 4.30)</b></p> <p><i>Different requirements apply to different kinds of signs.</i></p>	<p><input type="checkbox"/> Install exit door markings.</p>
<p>55. If provided, do signs and room numbers designating permanent rooms and spaces where programs/services are provided comply with appropriate sign requirements?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Provide signs that have raised letters, Grade II Braille, and meet other requirements for permanent room/space signage.</p>
<p>56. Are tactile signs mounted with centerline 60 inches from the floor? Height: _____</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Mount tactile signs.</p>
<p>57. Are tactile signs mounted on wall adjacent to latch side of door, or as close as possible?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Mount tactile signs on adjacent wall.</p>
<p>58. Are raised characters between 5/8 and 2 inches high with high contrast (for room numbers, toilet rooms and exits)? Character Height: _____</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Install raised characters.</p>
<p>59. Is Braille text the same information?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Install the same information in Braille text.</p>



## Combined Physical/Program Access Checklist

### Directional and Informational Signage

60. If mounted above 80 inches, are letters at least 3 inches with high contrast and non-glare finish?

Height: \_\_\_\_\_

☐ Yes ☐ No

- ☐ Provide signs that have raised letters, Grade II Braille, and meet other requirements for permanent room/space signage.

Facility Name: \_\_\_\_\_

ACCESS ELEMENT C (cont.)	POSSIBLE SOLUTIONS
<p>61. Do directional and informational signs comply with legibility requirements?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Directories and temporary signs need not comply.</p> <p><b>Controls (Title 24 1118B, 1133B.2.5.1)</b></p> <p>62. Are controls available for use by the public or employees (electrical, mechanical, cabinet, self-service controls) and located at an accessible height? Height: _____</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><i>Reach ranges: For a forward reach, 48 inches for a maximum height and 15 inches for a minimum height.</i></p> <p>63. Are they operable with a closed fist?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><b>Seats, tables &amp; counters (Title 24 1122b)</b></p> <p>64. Are aisles between fixed seating (other than assembly areas) at least 36 inches wide?</p> <p>Width: _____</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>65. Are spaces for wheelchair seating dispersed throughout?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>66. Are tabletops and counters 28-34 inches high?</p>	<p><input type="checkbox"/> Review requirements and replace signs as needed.</p> <p><input type="checkbox"/> Relocate controls.</p> <p><input type="checkbox"/> Replace controls.</p> <p><input type="checkbox"/> Rearrange chairs or tables to provide 36-inch aisles.</p> <p><input type="checkbox"/> Remove some fixed seating.</p> <p><input type="checkbox"/> Rearrange seating.</p> <p><input type="checkbox"/> Lower part or all of high surface.</p>

## Combined Physical/Program Access Checklist

<div style="display: flex; justify-content: space-between; margin-bottom: 10px;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div> <p>67. Is knee space at accessible tables at least 27 inches high, 30 inches wide and 19 inches deep?  Height: _____ Width: _____ Depth: _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div>	<div style="display: flex; flex-direction: column; gap: 10px;"> <input type="checkbox"/> Provide auxiliary table or counter.  <input type="checkbox"/> Replace or raise tables.  <input type="checkbox"/> Replace table </div>
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Facility Name: \_\_\_\_\_

ACCESS ELEMENT C (cont.)	POSSIBLE SOLUTIONS
<p>68. At each type of transaction counter, is a part of the main counter no more than 34 inches high?  Height: _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div> <p>69. Is a portion of the counters no more than 34 inches high or has space for passing items to persons who have difficulty reaching over a high counter? Height: _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div> <p><b>Vertical circulation [Title 24 1120b]</b></p> <p>70. Are there ramps, wheelchair lifts or elevators to all public areas?</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div> <p>71. If there are stairs between the entrance and/or elevator and essential public areas, is there an accessible alternate route on each level?</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div> <p><b>Stairs (ADAAG 4.9.4; Title 24 1003.3.3.6.1a, 1133B.4.2, 1133B.4.5.1)</b></p> <p><b>These questions apply to stairs connecting levels not served by an elevator, ramp or lift.</b></p> <p>72. Do treads have a non-slip surface?</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div> <p>73. Do stairs have continuous rails on both sides with extensions beyond the top and bottom</p>	<div style="display: flex; flex-direction: column; gap: 10px;"> <input type="checkbox"/> Provide lower auxiliary counter or folding shelf.  <input type="checkbox"/> Arrange counter and furnishings to create a space to exchange items.    <input type="checkbox"/> Lower a section of counter.  <input type="checkbox"/> Arrange counter and furnishings to create a space to pass items.    <input type="checkbox"/> Install ramps or lifts.  <input type="checkbox"/> Modify a service elevator.  <input type="checkbox"/> Relocate goods/services to an accessible area.  <input type="checkbox"/> Post clear signs directing people along an accessible route.      <input type="checkbox"/> Add non-slip surface to treads.    <input type="checkbox"/> Add or replace handrails if possible within existing floor plan. </div>

## Combined Physical/Program Access Checklist

stairs? <input type="checkbox"/> Yes <input type="checkbox"/> No  <b>Elevators (ADAAG 4.10; title 24 3003.4)</b>  74. Are there visual and verbal or audible door opening/closing and floor indicators? <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Install visual and verbal or audible signals.
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Facility Name: \_\_\_\_\_

ACCESS ELEMENT C (cont.)	POSSIBLE SOLUTIONS
75. Are call buttons in hallway no higher than 42 inches? Height: _____ <input type="checkbox"/> Yes <input type="checkbox"/> No  76. Do controls in the cab have raised and Braille lettering? <input type="checkbox"/> Yes <input type="checkbox"/> No  77. Is inside dimension of elevator at least 54" x 68" for side opening door, 54" x 80" for center opening door? <input type="checkbox"/> Yes <input type="checkbox"/> No  What is the inside width: _____ depth: _____ of the elevator/lift?  What is the width of the door? _____  78. Is there a sign on both doorjambs at every floor indicating the floor in raised and Braille letters? <input type="checkbox"/> Yes <input type="checkbox"/> No  79. If an emergency intercom is provided, is it usable without voice communication? <input type="checkbox"/> Yes <input type="checkbox"/> No  80. Is the emergency intercom identified by Braille and raised letters? <input type="checkbox"/> Yes <input type="checkbox"/> No  <b>Lifts (Title 24 1116b.2, 3008)</b>  81. Can the lift be used without assistance? <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Lower call buttons. <input type="checkbox"/> Provide permanently attached reach stick.  <input type="checkbox"/> Install raised lettering and Braille next to buttons.          <input type="checkbox"/> Install tactile signs to identify floor numbers, 60 inches from the floor.   <input type="checkbox"/> Modify communication system.   <input type="checkbox"/> Install tactile identification.      <input type="checkbox"/> At each stopping level, post clear instructions for using the lift.

## Combined Physical/Program Access Checklist

<p>82. Is there at least 30 by 48 inches of clear space for someone in a wheelchair to reach the controls and use the lift?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Rearrange furnishings and equipment to clear more space.</p>
<p>83. Are controls between 15 and 48 inches high? Height: _____</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Move controls.</p>

Facility Name: \_\_\_\_\_

ACCESS ELEMENT D: USABILITY OF TOILET ROOMS	POSSIBLE SOLUTIONS
<p><b>Getting to toilet rooms (ADAAG 4.1.3; Title 24 1115b)</b></p>	
<p>84. Is at least one toilet room available to the public (one for each sex or unisex) fully accessible?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Provide a fully accessible public toilet room.</p>
<p>85. Are there signs at inaccessible rest rooms that give directions to accessible ones?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Install directional signs.</p>
<p><b>Doorways &amp; passages (ADAAG 4.2, 4.13, 4.30; Title 24 1115b)</b></p>	
<p>86. Is there tactile signage identifying rest rooms? <i>Mount signs on wall on the latch side of the door under permanent signage requirements.</i></p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Add accessible signage placed to the side of the door, 60 inches to centerline - not on the door itself.</p>
<p>87. Are pictograms or symbols used to identify toilet rooms?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Install directional signs.</p>
<p>88. Is the doorway at least 32 inches clear? Clear width: _____</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Install offset (swing-clear hinges). <input type="checkbox"/> Widen the doorway.</p>
<p>89. Are doors equipped with accessible handles (operable with a closed fist), 44 inches high or less? Height: _____</p>	<p><input type="checkbox"/> Lower handles. <input type="checkbox"/> Replace knobs/latches with lever or loop handles.</p>

## Combined Physical/Program Access Checklist

<div style="display: flex; justify-content: space-between; margin-bottom: 10px;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div> <p>90. Is door pressure 5 pounds or less? Force: _____</p> <div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div>	<div style="display: flex; flex-direction: column; gap: 10px;"> <input type="checkbox"/> Add lever extensions.  <input type="checkbox"/> Install power-assisted or automatic door openers.   <input type="checkbox"/> Adjust or replace doors.  <input type="checkbox"/> Install lighter doors.  <input type="checkbox"/> Install power-assisted or automatic door openers.         </div>
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Facility Name: \_\_\_\_\_

ACCESS ELEMENT D (cont.)	POSSIBLE SOLUTIONS
<p>91. Does the entry setup provide adequate maneuvering space for a person using a wheelchair? Space: _____</p> <div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div> <p>A person in a wheelchair needs 44 inches of clear width for forward movement, and a 5-foot diameter or T-shape clear space to make turns. A minimum 48 inches clear of the door swing is needed between the two doors of an entry vestibule.</p> <p>92. Is there a 44-inch wide path to all fixtures? Width: _____</p> <div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div> <p><b>Stalls (Title 24 1115b.7.1)</b></p> <p>93. Is the stall door operable with a closed fist inside and out?</p> <div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div> <p>94. Is there a wheelchair accessible stall with a clear area at least five feet in diameter or a T-shaped clear space for turning around? Length: _____ Width: _____</p> <div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div> <p>95. In the accessible stall, are there grab bars on the walls behind and to the side of nearest the toilet?</p> <div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No</span> </div>	<div style="display: flex; flex-direction: column; gap: 10px;"> <input type="checkbox"/> Rearrange chairs, trashcans, etc.  <input type="checkbox"/> Remove inner door if there is a vestibule with two doors.  <input type="checkbox"/> Move or remove obstructing partitions.   <input type="checkbox"/> Remove obstructions.   <input type="checkbox"/> Replace inaccessible knobs with lever or loop handles.  <input type="checkbox"/> Add lever extensions.   <input type="checkbox"/> Move or remove partitions.  <input type="checkbox"/> Reverse the door swing if it is safe to do so.   <input type="checkbox"/> Add grab bars.         </div>

## Combined Physical/Program Access Checklist

<p>96. Is the toilet seat 17 to 19 inches high? Height _____</p> <p><input type="checkbox"/> Yes                      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Add raised seat.</p>
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Facility Name: \_\_\_\_\_

ACCESS ELEMENT D (cont.)	POSSIBLE SOLUTIONS
<p><b>Lavatories (Title 24 1115b.9.1.1, 1124b.1; plumbing code 1501.0, 1504.2, 1504.2.1)</b></p> <p>97. Does one lavatory have a 30-inch wide by 48-inch deep clear space in front? Space: _____</p> <p><input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>98. Is the top of the lavatory rim no higher than 34 inches? Height: _____</p> <p><input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>99. Is there at least 29 inches from the floor to the bottom of the lavatory apron excluding pipes? Height: _____</p> <p><input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>100. Can the faucet be operated with one closed fist?</p> <p><input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>101. Are soap and other dispensers and hand dryers within reach ranges (maximum 40") and usable with one closed fist?</p> <p><input type="checkbox"/> Yes                      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Rearrange furnishings.</p> <p><input type="checkbox"/> Replace lavatory.</p> <p><input type="checkbox"/> Remove/alter cabinetry to provide space.</p> <p><input type="checkbox"/> Make sure hot pipes are covered.</p> <p><input type="checkbox"/> Move partition or wall.</p> <p><input type="checkbox"/> Adjust or replace lavatory.</p> <p> </p> <p><input type="checkbox"/> Adjust or replace lavatory.</p> <p> </p> <p><input type="checkbox"/> Replace with paddle handles.</p> <p> </p> <p><input type="checkbox"/> Lower dispensers.</p> <p><input type="checkbox"/> Replace with or provide additional accessible dispensers.</p>

## Combined Physical/Program Access Checklist

102. Is the mirror mounted with the bottom edge of the reflecting surface 40 inches high or lower?

☐ Yes

☐ No

☐ Add a larger mirror elsewhere in the room.

☐ Lower or tilt down the mirror.

Facility Name: \_\_\_\_\_

ACCESS ELEMENT E: ADDITIONAL ACCESS	POSSIBLE SOLUTIONS
<p><b>When amenities such as drinking fountains and public telephones are provided, they should be accessible to people with disabilities</b></p> <p><b>Drinking fountains (Title 24 1117b.1; plumbing code 1507.3)</b></p> <p>103. Is there at least one fountain with clear floor space at least 30 by 48 inches in front? Space: _____ <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>104. Is there one fountain with a spout no higher than 36 inches from the ground? Height: _____ <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>105. Are controls mounted on the front or on the side near the front edge and operable with one closed fist? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>106. Is each water fountain cane-detectable (located within 27 inches of the floor or protruding less</p>	<p><input type="checkbox"/> Clear more room by rearranging or removing furnishings.</p> <p><input type="checkbox"/> Provide cup dispensers for fountains with spouts that are too high.</p> <p><input type="checkbox"/> Provide accessible cooler.</p> <p><input type="checkbox"/> Replace the controls.</p> <p><input type="checkbox"/> Place a planter or other cane-detectable barrier on each side at floor level.</p>

## Combined Physical/Program Access Checklist

than 4 inches from the wall)? Height: \_\_\_\_\_

☐ Yes

☐ No

### Telephone (Title 24 1117b.2; ADAAG 4.31.5)

107. If pay or public use phones are provided, is there clear floor space of 30 by 48 inches in front of at least one?

☐ Yes

☐ No

108. Is the highest operable area of the phone no higher than 48 inches (up to 54 inches if a side approach is possible)? Height: \_\_\_\_\_

☐ Yes

☐ No

☐ Move furnishings

☐ Replace booth with open station.

☐ Lower telephone.

Facility Name: \_\_\_\_\_

ACCESS ELEMENT E (cont.)	POSSIBLE SOLUTIONS
<p>109. Does the phone protrude no more than 4 inches into the circulation space? Protrusion: _____</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Place a cane-detectable barrier on each side at floor level.</p>
<p>110. Does the public pay phone have large push-button controls?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Contact phone company to install large push-button controls.</p>
<p>111. Is the pay phone hearing-aid compatible?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Install hearing-aid compatible phone.</p>
<p>112. Is the pay phone adapted with volume control?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Have volume control added.</p>
<p>113. Is it identified with proper signage (symbol of telephone earpiece with radiating sound waves)?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Add signage.</p>
<p>114. If there are public pay phones, is one equipped with a text telephone (TTY)?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Install a text telephone.</p> <p><input type="checkbox"/> Have a TTY available.</p> <p><input type="checkbox"/> Provide a shelf and outlet next to standard phone.</p>



## Combined Physical/Program Access Checklist

115. Is the location of a text telephone identified by accessible signage with the international TTY symbol?

☐ Yes

☐ No

☐ Add signage.

Facility Name: \_\_\_\_\_

ACCESS ELEMENT F: COMMUNICATIONS	POSSIBLE SOLUTIONS
<p><b>One-Stop centers must ensure effective communication with individuals with disabilities.</b></p> <p><b>Information in Alternative Formats</b></p> <p>116. Upon request, are you able to provide literature, posting information, and audio-visual materials in formats which are understandable to persons with visual, hearing, learning and cognitive impairments?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p><b>Auxiliary Aids</b></p> <p>117. Are you able to provide appropriate auxiliary aids to ensure that communications with individuals with hearing, vision or speech impairment are as effective as communications</p>	<p><input type="checkbox"/> Write materials at a fifth grade reading level and use graphics.</p> <p><input type="checkbox"/> Develop and keep up-to-date a Resource List of services available in your area for taping, Braille and publishing materials in large print.</p> <p><input type="checkbox"/> Develop an active network with community-based organizations that serve individuals with disabilities.</p> <p><input type="checkbox"/> All videos must be captioned.</p> <p>Auxiliary aids include service or devices as:</p> <p><input type="checkbox"/> Certified sign language interpreters</p> <p><input type="checkbox"/> Assistive listening devices</p>

## Combined Physical/Program Access Checklist

with others?

☐ Yes ☐ No

*(Note that a written plan should be available so that all staff can locate, request, and obtain auxiliary aids.)*

118. Have you developed a budget for auxiliary aids which must be provided without charge to participants upon request?

☐ Yes ☐ No

- ☐ Televisions with captioning capability
- ☐ Telecommunications devices for deaf persons (TTY)
- ☐ Video text displays
- ☐ Readers
- ☐ Taped texts
- ☐ Braille materials and large print materials
- ☐ Computer Diskette.

☐ If No, the budget will be developed for the next fiscal year by \_\_\_\_\_  
(date)

Facility Name: \_\_\_\_\_

<b>ACCESS ELEMENT F (cont.)</b>	<b>POSSIBLE SOLUTIONS</b>
<p>119. Is staff provided with on-going training in the use of auxiliary aids and the procedures to obtain them?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><b>Information Technology</b></p> <p>120. Are you able to provide alternative access to a job network or other services delivered through a computer?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><i>(Note that staff should be trained in how to turn on the captions in different programs and websites so that videos and other graphics with sound can be viewed with the captions.)</i></p>	<p><input type="checkbox"/> If No, training will be developed by: _____ (date)</p>  <p><input type="checkbox"/> Have at least one staff member available to read and type for an individual with a visual impairment or assist an individual with a cognitive or hearing impairment.</p> <p><input type="checkbox"/> Provide adjustable workstation furniture that can be raised and lowered to accommodate the needs of the customer.</p> <p><input type="checkbox"/> Provide printed output at waist height.</p> <p><input type="checkbox"/> Provide workstations that are designed to accommodate wheelchairs.</p> <p><input type="checkbox"/> Provide universal workstation aids, such as a track ball, wrist rests and articulated forearm rests that can be adapted to the individual user.</p> <p><input type="checkbox"/> Consider configuring workstations with 17" or 21" monitors to accommodate the</p>

## Combined Physical/Program Access Checklist

	<p>sight impaired.</p> <p><input type="checkbox"/> Equip workstations with a screen magnifier and a keyboard with large print keytop labels for easy viewing.</p> <p><input type="checkbox"/> Incorporate Braille printing, screen reading software with speech synthesizer or possibly speech input into the workstation configuration in accordance with industry standards addressing compatibility.</p>
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Facility Name: \_\_\_\_\_

ACCESS ELEMENT G: EMERGENCY EVACUATION	POSSIBLE SOLUTIONS
<p><b>One-Stop centers must ensure the safety of employees and participants with disabilities during emergencies.</b></p> <p><b>Evacuation Plan</b></p> <p>121. Do you have an emergency evacuation plan that identifies the individuals who need assistance, roles of key staff, egress routes, emergency contact telephone numbers, debriefing and counseling services?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>122. Does the emergency warning system include a system of flashing lights?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>	<p><input type="checkbox"/> The evacuation plan will be developed and in place by: _____ (date)</p> <p><input type="checkbox"/> Install an emergency warning system of flashing lights.</p>

## Combined Physical/Program Access Checklist

ACCESS ELEMENT H: STAFF DEVELOPMENT	POSSIBLE SOLUTIONS																		
<p><b>Staff must be knowledgeable of the One-Stop Center's legal obligations with respect to compliance with the Americans with Disabilities Act (ADA) Title II, the Rehabilitation Act (Section 504) and the Nondiscrimination and Equal Opportunity Regulations for the Workforce Investment Act.</b></p> <p>123. Do you provide staff training and development in the following areas:</p> <table style="width: 100%; margin-top: 10px;"> <tr> <td style="width: 30%;">Disability Awareness</td> <td style="width: 30%;"><input type="checkbox"/> Yes</td> <td style="width: 30%;"><input type="checkbox"/> No</td> </tr> <tr> <td>Civil Rights</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Confidentiality</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Ethics</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Conflict Management</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Work Place Diversity</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> </table>	Disability Awareness	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Civil Rights	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Confidentiality	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Ethics	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Conflict Management	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Work Place Diversity	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<div style="margin-top: 20px;"> <input type="checkbox"/> Develop an Individualized Development Plan for each staff member covering the competencies indicated.         </div> <div style="margin-top: 10px;"> <input type="checkbox"/> Develop quick reference guidelines for staff to use when greeting individuals with disabilities as well as all customers entering the One-Stop Center.         </div> <div style="margin-top: 10px;"> <input type="checkbox"/> Provide staff training.         </div>
Disability Awareness	<input type="checkbox"/> Yes	<input type="checkbox"/> No																	
Civil Rights	<input type="checkbox"/> Yes	<input type="checkbox"/> No																	
Confidentiality	<input type="checkbox"/> Yes	<input type="checkbox"/> No																	
Ethics	<input type="checkbox"/> Yes	<input type="checkbox"/> No																	
Conflict Management	<input type="checkbox"/> Yes	<input type="checkbox"/> No																	
Work Place Diversity	<input type="checkbox"/> Yes	<input type="checkbox"/> No																	

Facility Name: \_\_\_\_\_

ACCESS ELEMENT I: ACCESS TO PUBLIC MEETINGS	POSSIBLE SOLUTIONS
<p><b>One-Stop Center activities must be held only in accessible buildings when accessibility is needed for staff or participants.</b></p> <p><b>Public Meetings and Training Policies</b></p> <p>124. Do your policies and practices provide individuals with disabilities with equal participation in public meetings and training sessions?</p> <p style="margin-top: 10px;"> <input type="checkbox"/> Yes      <input type="checkbox"/> No         </p>	<div style="margin-top: 20px;"> <input type="checkbox"/> Send meeting notices that include the process for requesting reasonable accommodation and the name of a contact person and telephone/TTY number.         </div> <div style="margin-top: 10px;"> <input type="checkbox"/> Put meeting notices on local TV and radio as well as newspapers for people with visual or cognitive impairments.         </div> <div style="margin-top: 10px;"> <input type="checkbox"/> Provide individuals with allergies or environmental illness an opportunity to request a fragrance-free environment. If this is the case, notify all participants to         </div>

### Combined Physical/Program Access Checklist

refrain from wearing heavily scented products and to air out dry-cleaned clothes.

☐ Provide information about bus routes, parking and physical accessibility.

☐ Arrange the seating for wheelchair accessibility.

**Facility Name:** \_\_\_\_\_

**Completed By:** \_\_\_\_\_  
(print name)

\_\_\_\_\_  
(signature)

**Date Completed:** \_\_\_\_\_ **Phone Number:** \_\_\_\_\_

# ADDENDUM – PART 1

## SECTION D: TRANSITION PLAN

If deficiencies are found in either program or physical access, a Transition Plan must be developed to identify the deficiencies and to provide a schedule of activities for improvement. The Transition Plan is required under the Americans with Disabilities Act (ADA) to continue the effort to affect changes in the way public entities do business, and also serves as corrective action planning for the Compliance Review Division. Title 28 of the Code of Federal Regulations Part 35 states that public entities, which employ 50 or more persons, that need structural changes to facilities to achieve program accessibility, shall develop a Transition Plan setting forth the steps necessary to complete such changes. At a minimum, the Transition Plan should contain the following information:

- A list of the physical/program barriers that limit access to programs and services for people with disabilities;
- A detailed outline of the methods to be used in removing barriers and making programs accessible;
- A schedule for taking necessary steps to achieve compliance. If the time period for achieving compliance is to be longer than one year, the Transition Plan should identify interim steps to be taken to achieve program access; and
- The name of the official person responsible for implementing the Transition Plan.

In addition, California expects each Local Workforce Investment Area (LWIA) and each One-Stop Center to establish physical and program access goals that go beyond minimal legal compliance. Goals should be developed for various physical and program access elements and should be focused on creating an environment that is not just accessible, but that is comfortable and welcoming to all customers. Goals may be established for any of the access elements whether or not the element reflects an access deficiency. Goal planning should occur after the self-assessment has been completed and prior to developing the Transition Plan. Indicate which goals pertain to the correction of deficiencies in legal compliance and which are intended as enhancements designed to go beyond minimal compliance. **Only those goals to bring the identified physical or programmatic deficiencies into compliance should be entered on the Transition Plan.**

Page D-2 discusses the Goal Planning Worksheet and how to complete it. A sample of a partially completed worksheet begins on page D-3. The worksheet is available electronically as a Microsoft Word table, or goal planners may re-create their own worksheet. This worksheet, and the goals that it reflects, should be submitted with the Transition Plan.

Page D-6 contains a discussion of the Transition Plan and the use of the Transition Plan template. The template itself begins on page D-8 and is available electronically in Microsoft Excel. Transition planners may use the electronic template, or re-create their own.

## **Local Workforce Investment Area and One-Stop Center Goal Planning Worksheet**

The left-hand column of the template is entitled “Access Element,” and this is where the individual access element, whether it be broad (e.g., Path of Travel) or specific (e.g., Doors) should be listed. The template follows the same sequence of numbered access elements found in the checklist. Access elements that should be listed are those in the checklist for which the facility has discovered deficiencies, or for those in the checklist for which the facility meets minimum legal requirements, but for which the facility wishes to establish a higher standard.

The second column should contain the current status of the access element or feature. The third column is where the facility should articulate its goal for that element or feature, regardless of whether the goal is to remedy deficiencies or to establish a higher standard. The fourth and final column, which may be left blank, is for listing any reasons that the goal may not be currently feasible.

These goals have to do with “quality of life” issues that articulate what must be accomplished in order to make the physical and program environments the most welcoming, comfortable, and satisfying for all customers, including persons with disabilities. As such, these goals may not all be immediately obtainable, but should serve as reasonable objectives in the effort to provide truly universal and welcoming access for the entire community to all of the LWIA’s and One-Stop Centers’ programs and services. These goals should then be articulated in the Transition Plan.

**FOLLOWING IS A SAMPLE TEMPLATE THAT PROVIDES EXAMPLES OF HOW THE COLUMNS SHOULD BE COMPLETED. LWIAs AND ONE-STOP CENTERS SHOULD USE THE WORKSHEET FOR THEIR FACILITIES.**

## PREFERRED ACCESS GOALS FOR CALIFORNIA ONE-STOP CENTERS

Access Element	Current Status of Feature	Goal	Barrier
1. Integrated Programs	The One-Stop Center provides equal access to all programs, services, or activities it offers, although some access is still provided only through segregated settings.	To offer all access through integrated settings and to allow customers with disabilities the <i>right to choose</i> and <i>right to refuse</i> a service offered in either an <i>integrated</i> or <i>segregated</i> setting.	
2. Accessible Approach and Entrance			
Route of Travel	The One-Stop Center currently provides an accessible path of travel, which requires customers with disabilities to enter at the back of the facility.	To provide an accessible primary exterior path of travel for customers with disabilities from the point of arrival to the primary entrance.	A, C, E
3. Access to Programs and Services			
Doors	The One-Stop Center currently has manual doors at the front entrance that require an opening force of 8.5 lbs.	To install automatic doors at the primary public exterior entrances(s).	



## PREFERRED ACCESS GOALS FOR CALIFORNIA ONE-STOP CENTERS

Access Element	Current Status of Feature	Goal	Barrier
4. Usability of Toilet Rooms	The One-Stop Center currently has only one set of restrooms that are fully accessible to customers with disabilities.	To make all restrooms in the facility fully accessible.	E
5. Additional Physical Access			
6. Communications			
7. Emergency Evacuation			
8. Staff Development	All One-Stop Center staff has been trained in the center's obligations with respect to access compliance.	To develop quick reference guides for use by all staff and to train partner staff in obligations with respect to compliance.	
9. Access to Public Meetings			

1. The column titled Access Element indicates the item as taken from the Physical and Program Access Self-Assessment tool.
2. The column title Current Status of Feature indicates the status of the access element, whether or not it meets minimum compliance standards.
3. The column titled Goal provides an example of a goal for One-Stop Centers to achieve for an access feature. For instance, at a minimum, a drinking fountain is required to be accessible only if alterations are being performed at the facility. A goal for that building feature, therefore, might be that all drinking fountains are accessible irrespective of alterations to the facility.
4. The column titled Barrier indicates the reason(s) a goal may not be currently feasible.

Barrier Legend:

- A. Historic building.
- B. Geological/Topographical/Climatic.
- C. Structural integrity of building.
- D. Route to facility often occurs outside One-Stop sphere of influence (city/county sidewalks).
- E. Budgetary – developers typically conform to minimum standards, therefore, increased accessibility costs may fall entirely to the One-Stop

## Transition Plan Template

Attached is a Transition Plan format for LWIAs and One-Stop Centers to use for any necessary transition planning. It includes a plan for program access issues (Section One), architectural modifications (Section Two), curb cuts and curb ramps (Section Three), and an explanation for issues not to be corrected due to an unreasonable hardship (Section Four). Sections One and Two should be completed for each facility, listing all barriers to be removed, descriptions of the necessary architectural modifications necessary to remove barriers, cost estimates and the anticipated year of completion.

If a One-Stop Center has responsibility or authority over streets, roads, or walkways, the Transition Plan should include a schedule for providing curb ramps, or other sloped areas, where pedestrian walks cross curbs. If applicable, Section Two should be used to list the locations of curb cuts and curb ramps needed to provide access to the sidewalks and pedestrian ways controlled by the One-Stop Center. A single unit cost can be estimated unless there are unusual conditions requiring extensive ramping. An estimated completion date for each curb ramp and curb cut should also be entered. It is useful to attach a map of the streets and walkways to the Transition Plan. Numbers can then be shown in section two that correspond to numbered locations on the map.

Barriers in Sections One and Two should be prioritized when entered on the Transition Plan. Input from persons with disabilities can assist with setting priorities for the implementation of improvements. High priority items should be corrected first. Until a barrier is removed, services should be provided through an “equivalent facilitation.” The term “equivalent facilitation” is defined as an accommodation that allows a person with a disability to perform essential functions in the same manner as other employees or customers.

Section Four identifies barriers that will not be removed because to do so would impose an unreasonable financial or administrative hardship. The term “unreasonable hardship” is defined as an ADA deficiency that requires significant difficulty to correct.

Factors that should be considered in determining unreasonable hardship include:

- The nature and cost of the accommodation;
- Financial resources;
- The technical feasibility to correct a deficiency, which means mitigation cannot be accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces or features; and
- Whether or not the facility is a historical building, which may prohibit some types of alterations

*Unreasonable hardship is not to be used as an excuse for noncompliance.* Every effort to correct deficiencies should be made. Budgetary constraints or other factors that support an unreasonable hardship claim must be described in detail in Section Four. The unreasonable hardship determination must be made by an official with budgetary authority. For deficiencies that will not be corrected, a description of the steps to be taken in lieu of barrier removal, such as an equivalent facilitation, should be listed in section three.

Once all sections are completed, they will provide a basis for the draft Transition Plan. The proposed plan should be made available to the public for comment. A public meeting is an effective way of providing persons with disabilities, representative organizations, and other concerned parties with an opportunity to comment on and discuss the Transition Plan. An actively involved advisory group comprised of individuals with disabilities is another way to get participation in the development of the Transition Plan.

To complete the Transition Plan, revise the draft as necessary in response to the comments received from persons with disabilities. Attach copies of the draft to the final Transition Plan, along with any other supporting documentation. Secure approval as necessary within the One-Stop Center and have the official responsible for implementation sign the final Transition Plan.

Once barrier removal has begun, the Transition Plan should be updated to show the LWIA or One-Stop Center's progress. Establishing completion dates, modifying, checking, and updating the plan can help reduce discrimination complaints and alleviate possible litigation by establishing a public entity's good faith efforts to comply with the Title II ADA requirements.

# TRANSITION PLAN

## SECTION ONE – PROGRAM ACCESS SOLUTIONS

Location where program occurs \_\_\_\_\_ Program Name: \_\_\_\_\_

Worksheet completed by: \_\_\_\_\_ Telephone #: \_\_\_\_\_ Date: \_\_\_\_\_

Description of Program Barrier	Description of the Proposed Solution	Description of Equivalent Facilitation to be Provided Until Barrier Removal Occurs	Cost Estimate	Implementation Schedule				
				2002	2003	2004	2005	2006
			<b>TOTAL</b>					

Signature of Official Responsible for Implementation: \_\_\_\_\_  
 (Attach list of persons with disabilities who have commented)

Page \_\_\_\_ of \_\_\_\_

## TRANSITION PLAN

### SECTION TWO – SUMMARY OF ARCHITECTURAL MODIFICATIONS

Facility Name and Address: \_\_\_\_\_ Total Number of Facilities: \_\_\_\_\_

Worksheet completed by: \_\_\_\_\_ Telephone #: \_\_\_\_\_ Date: \_\_\_\_\_

Description and Location of Physical Barrier (in order of priority)	Description Regarding the Type of Barrier Removal Required	Description of Equivalent Facilitation to be Provided Until Barrier Removal Occurs	Cost Estimate	Implementation Schedule				
				2002	2003	2004	2005	2006
			<b>TOTAL</b>					

Signature of Official Responsible for Implementation: \_\_\_\_\_  
 (Attach list of persons with disabilities who have commented)

Page \_\_\_\_ of \_\_\_\_

# **TRANSITION PLAN** **SECTION THREE – CURB CUTS AND CURB RAMPS**

Facility Name and Address: \_\_\_\_\_ Total Number of Curb Cuts/Ramps: \_\_\_\_\_

Worksheet completed by: \_\_\_\_\_ Telephone #: \_\_\_\_\_ Date: \_\_\_\_\_

Locations Where Curb Cuts and Curb Ramps Are Needed (or map code number)	Cost Estimate	Implementation Schedule				
		2002	2003	2004	2005	2006
	<b>TOTAL</b>					

Signature of Official Responsible for Implementation: \_\_\_\_\_  
 (Attach list of persons with disabilities who have commented)

Page \_\_\_\_ of \_\_\_\_

## TRANSITION PLAN SECTION FOUR – UNREASONABLE HARDSHIP

Facility Name and Address: \_\_\_\_\_ Total Number of Facilities: \_\_\_\_\_

Worksheet completed by: \_\_\_\_\_ Telephone #: \_\_\_\_\_ Date: \_\_\_\_\_

Description and Location of Barrier	Description Regarding the Type of Barrier Removal Required	Cost Estimate	Explanation of Unreasonable Hardship	Description of Equivalent Facilitation to be Provided in Lieu of Barrier Removal
		TOTAL		

Signature of Official Responsible for Implementation: \_\_\_\_\_  
(Attach list of persons with disabilities who have commented)

Page \_\_\_\_ of \_\_\_\_



# **ADDENDUM – PART 1**

## **SECTION E: RESOURCES**

This section contains a list of resources that may be of assistance to Local Workforce Investment Areas and One-Stop Centers as they assess and address physical and program access issues within their facilities. The list contains the best information available at the time of its development and will be expanded, edited, and made available over a State Website in the near future. The list includes both public and private organizations that distribute publications and/or provide other assistance relating to physical and program access.

Physical and program access compliance is not a one-time proposition. It will not be finished when the self-assessment process is completed or even when the last piece of the Transition Plan has been completed. Access compliance is an on-going process. The Physical and Program Access Self-Assessment will, as a part of the monitoring process, be completed at least once annually in order to identify and correct problems as they arise. In addition, full compliance may not be achieved quickly. It may take several years to fully implement the Transition Plan. The most important aspect of this endeavor is to make a good faith effort towards compliance and to promote a long-term cultural change regarding physical and program access in the One-Stop Centers. The following resource list provides invaluable tools in this ongoing effort.

The Employment Development Department does not control or guarantee the accuracy, relevance or completeness of information provided by other sources, including website links and service agencies offered as resources. Further, mentioning these website links and service agencies is not intended to reflect their importance, nor to endorse any product or service offered by each; rather, the list is offered as a partial grouping of both State and National capacity building tools.

**ABLEDATA** [www.abledata.com](http://www.abledata.com)

Provides information on assistive technology and rehabilitation equipment available from domestic and international sources to consumers, organizations, professionals, and caregivers within the United States. The ABLEDATA database contains information on more than 29,000 assistive technology products, detailed descriptions of each product, and information on non-commercial prototypes, customized and one-of-a-kind products, and do-it-yourself designs.

ABLEDATA  
8630 Fenton Street, Suite 930  
Silver Springs, MD 20910

Phone: (800)-227-0216  
TTY: (301) 608-8912  
Fax: (301) 608-8958

**The Access Board** [www.access-board.gov](http://www.access-board.gov)

Contains information on Section 508 of the Rehabilitation Act, as amended requiring that electronic and information technology developed, procured, maintained, or used by the federal government be accessible to people with disabilities. The Access Board is an independent federal agency.

The Access Board  
1331 F Street, NW  
Suite 1000  
Washington, DC 20004-1111

Voice: (202) 272-5434  
TTY: (202) 272-5449  
Fax: (202) 272-5447  
Toll: (800) 872-2253  
Toll TTY: (800) 993-2822

**Access for All: A Resource Manual for Meeting the Needs of One-Stop Customers with Disabilities** [www.communityinclusion.org/onestop/onestopmanual.html](http://www.communityinclusion.org/onestop/onestopmanual.html)

Serves as a training and staff development tool for enhancing the ability of the One-Stop System to meet the needs of customers with disabilities, and also as a reference work for ongoing use in serving people with disabilities.

Institute for Community Inclusion/UCE  
300 Longwood Avenue  
Boston, Massachusetts 02115

Voice: (617) 355-6506  
TTY: (617) 355-5853  
Fax: (617) 739-6956

**The Alliance for Technology Access** [www.ataccess.org](http://www.ataccess.org)

Provides information and support services to children and adults with disabilities through a network of community-based resource centers, developers and vendors, affiliates, and associates working to increasing the use of assistive technology to people with disabilities.

The Alliance for Technology Access  
2175 E Francisco Boulevard, Suite L  
San Rafael, California 94901

Voice: (415) 455-4575  
TTY: (415) 455-0491  
Fax: (415) 455-0654

**Apple Computer, Inc., Worldwide Disability Solutions Group** [www.apple.com/disability/](http://www.apple.com/disability/)

Works with key education, rehabilitation and advocacy organizations nationwide to identify computer-related needs of people with disabilities and to help develop responsive programs.

Apple Technologies  
1 Infinite Loop  
Cupertino, California 95014

Voice: (800) 776-2333

**Assistivetech.net** [www.assistivetech.net](http://www.assistivetech.net)

Provides online up-to-date information on assistive technologies, adaptive environments and community resources focusing on the needs of people with disabilities, including their families, service providers and members of their communities.

Georgia Tech Center for Assistive Technology  
and Environmental Access  
490 Tenth Street, NW  
Atlanta, Georgia 30332-0156

Toll: (800) 726-9119  
Phone: (408) 894-0240  
Fax: (404) 894-9320

**Assistive Technology (AT) Network** [www.atnet.org](http://www.atnet.org)

Serves as an information and referral resource with a directory of over 700 listings of organizations, vendors, and programs providing assistive technology and assistive technology services for people in California.

AT Network  
660 J Street, Suite 270  
Sacramento, California 95814-2495

Voice: (916) 325-1690  
TTY: (916) 325-1695  
Fax: (916) 325-1699

Information and Referral Service  
Voice: 1-800-390-2699  
TDD: 1-800-900-0706

**California Foundation for Independent Living Centers** [www.cfilc.org/](http://www.cfilc.org/)

Collaborates with and supports local Independent Living Centers to increase their capacity to create and promote access and integration for people with disabilities. The California Foundations for Independent Living Centers is a statewide, non-profit organization made up of more than two dozen Independent Living Centers. Through unified action, the Foundation envisions civil rights for all people with disabilities.

**California Foundation for Independent  
Living Centers**  
660 J Street, Suite 270  
Sacramento, California 95814-2494

**Voice: (916) 325-1690**  
TTY: (916) 325-1695  
Fax: (916) 325-1699

**IBM Accessibility Center** [www-3.ibm.com/able/accessweb.html](http://www-3.ibm.com/able/accessweb.html)

Brings together product and service information for people with disabilities, and for human resource professionals who are proactively seeking knowledge about solutions or empowering people with disabilities to ensure a productive working environment.

IBM Accessibility Center  
11400 Burnet Road  
Austin, Texas 78758

Phone: (800) 426-4832  
TTY: (800) 426-3383

**Justice, United States Department of** [www.usdoj.gov/crt/ada/adahom1.htm](http://www.usdoj.gov/crt/ada/adahom1.htm)

Provides information for businesses including the Americans with Disabilities Act, business briefs, design standards, and regulations.

United States Department of Justice  
950 Pennsylvania Avenue, NW  
Civil Rights Division, Disability Rights Section - NYAVE  
Washington, DC 20530

Fax: (202) 307-1198

**Labor, United States Department of, Office of Disability Employment Policy**

[www.dol.gov/odep/welcome.html](http://www.dol.gov/odep/welcome.html)

Collaborates with employers and State and local agencies to increase awareness of the benefits of hiring people with disabilities, and to facilitate the use of effective strategies to expand access to training, education, employment supports, assistive technology, integrated employment, entrepreneurial development, and small-business opportunities.

Office of Disability Employment Policy  
1331 F Street, N.W., Suite 300  
Washington, DC 20004

Phone: (202) 376-6200  
TTY: (202)-376-6219  
Voice: (202) 376-6205

**Milt Wright & Associates, Inc.** [www.miltwright.com](http://www.miltwright.com)

A publishing, training and consulting firm focusing on job creation, job retention and employment resources.

- "Windmills" Attitudinal Training Program. Revised in 1993, "Windmills" is an attitudinal training program developed by the California Governor's Committee for Employment of Disabled Persons. The curriculum consists of 11 modules that use participation and discovery as learning vehicles.
- Working with People with Disabilities in a Job Placement/Job Retention Environment. A guide for creating opportunities for people with disabilities that offers practical approaches for anticipating the real or imagined problem that a job seeker with a disability might face and developing a strategy for removing or solving the real barriers and clarifying and overcoming the perceived barriers.

Milt Wright & Associates, Inc.  
9548 Topanga Canyon Boulevard  
Chatsworth, California 91311

Phone: (818) 349-0858  
Fax: (818) 349-0987  
Toll: (800) 626-3939

**National Business and Disability Council** [www.business-disability.com](http://www.business-disability.com)

Provides the full range of services to assist corporations in successfully integrating people with disabilities into the workplace and marketplace.

National Business and Disability Council  
201 I.U. Willets Road  
Albertson, New York 11507

Phone: (516) 465-1515  
Fax: (516) 465-3730

**Pacific Disability and Business Technical Assistance Center** [www.pacdbtac.org](http://www.pacdbtac.org)

Provides information, problem solving assistance and referrals for implementing the Americans with Disabilities Act. The Center is a federally funded regional resource serving Arizona, California, Hawaii, Nevada, and the Pacific Basin.

Pacific Disability and Business Technical  
Assistance Center  
Sciatic Avenue, Suite 301  
Berkeley, California 94704-1307

Voice: (510) 848-2980  
TDD: (510) 848-1840 2168  
Fax: (510) 848- 1981

**Rehabilitation Engineering and Assistive Technology Society of North America  
(RESNA)** [www.resna.org](http://www.resna.org)

An interdisciplinary association of people with a common interest in technology and disability uniting to improve the potential of people with disabilities to achieve their goals through the use of technology. The RESNA promotes research, development, education, advocacy and the provision of technology by supporting the people engaged in like activities.

RESNA  
1700 North Moore Street, Suite 1540  
Arlington, Virginia 22209-1903

Phone: (703) 524-6686  
TTY: (703) 524-6639  
Fax: (703) 524-6630

**Rehabilitation, State Department of** [www.rehab.ca.gov/public/contacts.htm](http://www.rehab.ca.gov/public/contacts.htm)

Assists Californians with disabilities to obtain and retain employment and maximize their ability to live independently in their communities. Provides vocational rehabilitation services to eligible Californians.

State Department of Rehabilitation  
2000 Evergreen Street  
Sacramento, California 95815

Voice: (916) 263-8981  
TTY: (916) 263-7477

Disability Access Section

Voice: (866) 208-3517

(Same address)

TTY: (866) 288-8612

**Tech Connection** [www.techconnection.org](http://www.techconnection.org)

Provides access to the assistive technologies, related services, and information resources that enable people with disabilities to achieve success, independence, productivity, and social interdependence according to their individual needs and interests.

Tech Connection  
35 Haddon Avenue  
Shrewsbury, New Jersey 07702

Phone: (732) 747-5310

Fax: (732) 747-1896

**The Job Accommodation Network, Office of Disability Employment Policy, United States**

**Department of Labor** [www.jan.wvu.edu/](http://www.jan.wvu.edu/)

Provides free consulting services about job accommodations, the Americans with Disabilities Act, and the employability of people with disabilities.

Job Accommodation Network

PO Box 6080

Morgantown, West Virginia 26506-6080

V/TTY, United States: 1-800-526-7234

1-800-232-9675

V/TTY Worldwide: 1-304-293-7186

Calls are answered from 8 a.m. to 8 p.m. Eastern Time Monday through Thursday and on Fridays from 8 a.m. to 7 p.m. Machines answer after-hours calls.

# ADDENDUM – PART 2

## PHYSICAL AND PROGRAM ACCESS SELF-ASSESSMENT ONE-STOP SUMMARY

### INSTRUCTIONS FOR COMPLETION

#### **Section 1 – One-Stop Centers**

1. Provide the Local Workforce Investment Area (LWIA) name, Executive Director's name and the contact information of the person completing the summary in case further clarification is needed.
2. List the Workforce Investment Act (WIA) funded One-Stop Centers in your LWIA and identify the type of center for each:
  - ☐ Comprehensive
  - ☐ Affiliated
  - ☐ Specialized
  - ☐ Kiosks
  - ☐ Mobile Unit
3. Use additional sheets if needed. Continue ID numbering of One-Stop Centers on additional sheets.

#### **Section 2 – Summary of Noncompliance**

Refer to the Physical and Program Access Self-Assessment checklist completed by each of the WIA-funded One-Stop Centers in your area. Summarize only those items found to be out of compliance in each One-Stop Center.

1. Enter the ID # of the One-Stop Center from Section 1 that has not met compliance under a specific access element.
2. Indicate which of the access elements are deficient and need to be brought into compliance.
3. Describe the status of the access element out of compliance.
4. Enter the transition plan that will bring this access element into compliance.
5. Enter the completion date when this access element will be brought into compliance.

Example:

ID #	ACCESS ELEMENT	CURRENT STATUS OF ACCESS ELEMENT	TRANSITION PLAN	COMPLETION DATE
<b>B. Accessible Approach and Entrance (Questions 8-39)</b>				
01, 05, 06, 07	Route of Travel Question 10	The four sites listed have routes of entrance less than 48 inches in width.	Landscaping will be removed and route will be paved to increase route to 48 inches.	Nov 2004

# **PHYSICAL AND PROGRAM ACCESS SELF-ASSESSMENT ONE-STOP SUMMARY**

## **Section 1- One-Stop Centers**

LWIA:				
EXECUTIVE DIRECTOR:				
NAME OF STAFF COMPLETING SUMMARY:				
TELEPHONE:		EMAIL ADDRESS:		
ID#	ONE-STOP CENTER NAME AND LOCATION	TYPE	IN COMPLIANCE? YES      NO	
01				
02				
03				
04				
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**PHYSICAL AND PROGRAM ACCESS  
SELF-ASSESSMENT ONE-STOP SUMMARY**

**Section 2 – Summary of Noncompliance**

ID #	ACCESS ELEMENT	CURRENT STATUS OF ELEMENT	TRANSITION PLAN	COMPLETION DATE
<b>A. Integrated Programs (Questions 1-7)</b>				
<b>B. Accessible Approach and Entrance (Questions 8-39)</b>				
<b>C. Access to Programs and Services (Questions 40-83)</b>				

**PHYSICAL AND PROGRAM ACCESS  
SELF-ASSESSMENT ONE-STOP SUMMARY**

**Section 2 – Summary of Noncompliance**

ID #	ACCESS ELEMENT	CURRENT STATUS OF ELEMENT	TRANSITION PLAN	COMPLETION DATE
<b>D. Usability of Toilet Rooms (Questions 84-102)</b>				
<b>E. Additional Access (Questions 103-115)</b>				
<b>F. Communications (Questions 116-120)</b>				

# **PHYSICAL AND PROGRAM ACCESS SELF-ASSESSMENT ONE-STOP SUMMARY**

## **Section 2 – Summary of Noncompliance**

ID #	ACCESS ELEMENT	CURRENT STATUS OF ELEMENT	TRANSITION PLAN	COMPLETION DATE
<b>G. Emergency Evacuation (Questions 121-122)</b>				
<b>H. Staff Development (Question 123)</b>				
<b>I. Access to Public Meetings (Question 124)</b>				